EXHIBIT 106

Redacted Version of Document Sought to be Sealed

Full Deposition Transcript of Jackie Chang, dated December 16, 2021

Page 1

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. MDL No. 2843

CONSUMER PRIVACY USER Case No. 18-md-02843-VC-JSC

PROFILE LITIGATION

_____/

CONFIDENTIAL

REMOTE DEPOSITION OF JACKIE CHANG Thursday, December 16, 2021

Job No. 4976949 Reported Remotely and Stenographically by: JANIS JENNINGS, CSR No. 3942, CLR, CCRR Pages 1 - 312

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               REMOTE DEPOSITION OF JACKIE CHANG, located
 8
     in Hillsborough, California, taken on behalf of the
 9
     Plaintiffs, beginning at 9:43 a.m., on Thursday,
10
11
     December 16, 2021, sworn remotely by Janis Jennings,
     Certified Shorthand Reporter No. 3942, CLR, CCRR,
12
     located in the City of Walnut Creek, County of
13
14
     Contra Costa, State of California.
15
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21
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25
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22	SHAWNA HAYNES, Videographer		
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24			
25			

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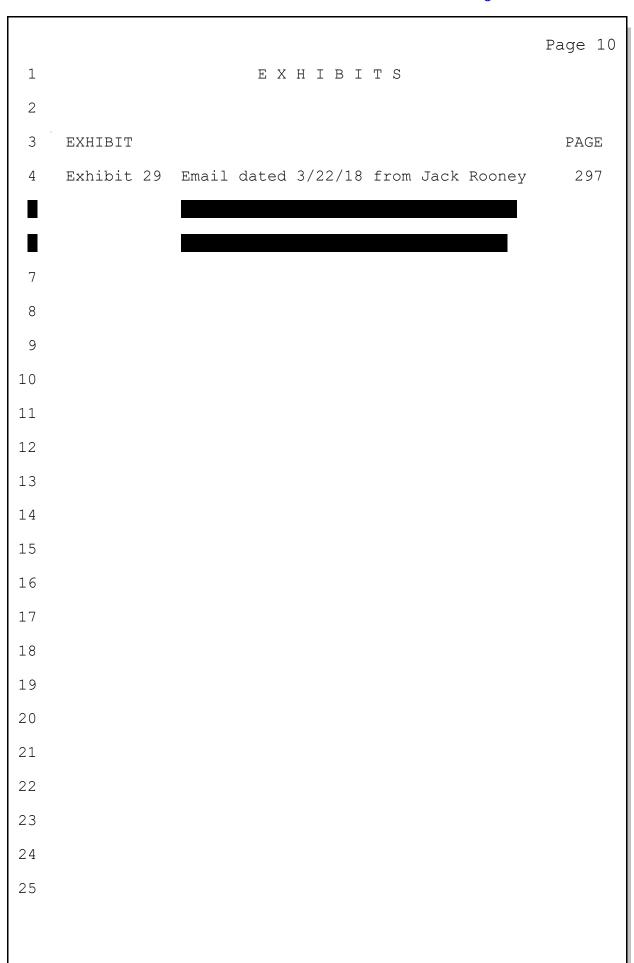
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1	THURSDAY, DECEMBER 16, 2021; 9:43 A.M.	
2		
3		
4	THE VIDEOGRAPHER: Good morning. We are	
5	going on the record at 9:43 a.m. on December 16th,	09:43
6	2021. Please note that the microphones may pick up	09:43
7	background noise, private conversations and	09:43
8	interference if unmuted. When muted, remember to	09:43
9	unmute to speak on the record. Audio and video	09:44
10	recording will continue to take place unless all	09:44
11	parties agree to go off the record.	09:44
12	This is media unit 1 of the video recorded	09:44
13	deposition of Jackie Chang taken by counsel for	09:44
14	plaintiff in the matter of In Re Facebook, Inc.	09:44
15	Consumer Privacy User Profile Litigation, all	09:44
16	related actions, filed in the United States	09:44
17	District Court, Northern District of California,	09:44
18	MDL No. 2843, case No. 18-md-02843-VC-JSC.	09:44
19	This deposition is being conducted via	09:44
20	Veritext Virtual Zoom Technology and all parties are	09:44
21	appearing remotely. My name is Shawna Haynes from	09:44
22	the firm Veritext Legal Solutions and I'm the	09:44
23	videographer. The court reporter is Janis Jennings	09:45
24	from the firm Veritext Legal Solutions. I am not	09:45
25	related to any party in this action, nor am I	09:45

	Pa	age 12
1	financially interested in the outcome.	09:45
2	Counsel and everyone attending remotely will	09:45
3	state their appearances and affiliations for the	09:45
4	record. If there are any objections to proceeding,	09:45
5	please state them at the time of your appearance	09:45
6	beginning with the noticing attorney.	09:45
7	MR. LOESER: Good morning. My name is Derek	09:45
8	Loeser for the plaintiffs from the firm of Keller	09:45
9	Rohrback.	
10	MS. WEAVER: Good morning. This is Lesley	09:45
11	Weaver from Bleichmar Fonti. With me is Matt	09:45
12	Melamed and Anne Davis, also of my firm, on behalf	09:45
13	of plaintiffs. Good morning, everybody.	09:45
14	MR. LOESER: And I also have Adele Daniel	09:45
15	from Keller Rohrback.	09:45
16	MR. FALCONER: Good morning. This is Russ	09:46
17	Falconer, with Gibson Dunn & Crutcher, here on	09:46
18	behalf of the defendant and on behalf of the	09:46
19	witness. I'm here with my colleagues Laura Mumm and	09:46
20	Colin Davis, as well as Ian Chen from Facebook.	09:46
21	SPECIAL MASTER GARRIE: Last, Daniel Garrie	09:46
22	with JAMS. I'm the special master.	09:46
23	THE VIDEOGRAPHER: Okay. Anyone else?	09:46
24	Thank you. Will the court reporter please	09:46
25		

	E	age 13
1	JACKIE CHANG,	
2	the witness herein, was sworn and	
3	testified as follows:	
4		09:46
5	DEPOSITION REPORTER: Thank you.	09:46
6	Please begin, Counsel.	09:46
7		
8	EXAMINATION	09:46
9	BY MR. LOESER:	09:46
10	Q. Good morning, Miss Chang. Could you please	09:46
11	state and spell your last name for the record?	09:46
12	A. Chang, C-h-a-n-g.	09:46
13	Q. Miss Chang, have you ever had your	09:46
14	deposition taken before?	09:47
15	A. No.	09:47
16	Q. Okay. Well, there are some ground rules	09:47
17	that make the that really are designed to make	09:47
18	the record clear. The first is that we should try	09:47
19	not to talk over each other. I will ask a question.	09:47
20	I'll try to ask a clear question. If you don't	09:47
21	understand the question, please ask me to restate	09:47
22	it. And if you answer the question, I will assume	09:47
23	that you understood the question.	09:47
24	Is that okay?	09:47
25	A. Yes.	09:47

	Pa	age 14
1	Q. And, again, we need to try not to speak at	09:47
2	the same time because it tortures the court	09:47
3	reporter. She can't take down our testimony if we	09:47
4	are talking over each other.	09:47
5	If at any point you need to take a break,	09:47
6	please let me know. I may finish asking a few	09:47
7	questions but, of course, if you would like to take	09:47
8	a break, we will make sure to allow you to take	09:47
9	breaks.	09:47
10	During the testimony, your counsel may	09:47
11	interpose objections and he has every right to do	09:47
12	that. You should answer the question unless you're	09:47
13	instructed not to do so by your counsel.	09:47
14	Do you understand that?	09:47
15	A. Yes.	09:48
16	Q. And you understand that your obligation here	09:48
17	today is to testify honestly and truthfully?	09:48
18	A. Yes.	09:48
19	Q. And that you are under oath?	09:48
20	A. Yes.	09:48
21	Q. Your testimony today is going to cover the	09:48
22	time period from 2007 through 2021. Do you	09:48
23	understand that?	09:48
24	A. Yes.	09:48
25	Q. And that will be the time period that's	09:48

	Po	age 15
1	covered unless I specifically state otherwise.	09:48
2	Okay?	09:48
3	A. Yes.	09:48
4	MR. LOESER: I'm going to show you what will	09:48
5	be marked as Exhibit No. 1 and that is your	09:48
6	deposition notice. And bear with us while we work	09:48
7	out the clunkiness of the platform here. We are	09:48
8	going to get the document up so you can see it, and	09:48
9	it will also be published via Veritext platform. So	09:48
10	it will be on a screen with the screen share, but	09:48
11	also you will have access to the document via the	09:48
12	Veritext platform.	09:48
13	(Exhibit 1 marked for identification.)	09:49
14	MR. LOESER: We need in the world of	09:49
15	Zoom, things always start interestingly. We need to	09:49
16	enable screen sharing so that we can do that.	09:49
17	THE VIDEOGRAPHER: It's enabled now.	09:49
18	BY MR. LOESER:	09:49
19	Q. Miss Chang, this is the deposition notice	09:49
20	that requires your attendance. Have you seen this	09:49
21	before?	09:49
22	A. No.	09:49
23	Q. Do you understand that you're testifying	09:49
24	today in response to a subpoena directing you to	09:49
25	appear to have your deposition taken?	09:49

	Pa	age 16
1	MR. FALCONER: Objection. Foundation.	09:49
2	Go ahead.	09:49
3	THE WITNESS: Sorry. Can you repeat the	09:49
4	question?	09:49
5	BY MR. LOESER:	09:49
6	Q. Sure. Do you understand that your testimony	09:49
7	today is being taken in response to a subpoena that	09:49
8	requires your a deposition notice that requires	09:49
9	your attendance?	09:50
10	A. Yes.	09:50
11	MR. LOESER: We can stop sharing that.	09:50
12	BY MR. LOESER:	09:50
13	Q. Miss Chang, what did you do to prepare today	09:50
14	for your deposition?	09:50
15	A. I met with counsel, Mr. Falconer and Miss	09:50
16	Mumm and Mr. Chen, and I can't remember the other	09:50
17	one.	09:50
18	Q. And how many times did you meet with them?	09:50
19	A. I met with them about three times.	09:50
20	Q. And for how much time each time?	09:50
21	A. About three hours.	09:50
22	Q. And did you speak to anyone at Facebook	09:50
23	about your testimony today?	09:50
24	A. No. I mean, Mr Mr. Chen, the counsel	09:50
25	or	09:51

		Pa	age 17
1	Q.	Mr. Chen is in-house counsel at Facebook?	09:51
2	Α.	Yes. I think so.	09:51
3	Q.	And did you review any documents to prepare	09:51
4	for your	testimony today?	09:51
5	Α.	Yes.	09:51
6	Q.	And what documents? Can you generally	09:51
7	describe	the documents that you reviewed?	09:51
8	Α.	They appeared to be emails and an Excel	09:51
9	spreadsh	eet.	09:51
10	Q.	And any other types of documents that you	09:51
11	reviewed	?	09:51
12	А.	Not that I recall.	09:51
13	Q.	And how many documents would you say in	09:51
14	total di	d you review?	09:51
15	Α.	About maybe four or five.	09:51
16	Q.	And were those documents selected by	09:51
17	counsel?		09:51
18	Α.	Yes.	09:51
19	Q.	And did they refresh your recollection as to	09:51
20	any even	ts during the time period that we're	09:52
21	covering	today?	09:52
22	Α.	Sorry, can you sorry, in what sense?	09:52
23	Q.	Did it remind you of events or occurrences	09:52
24	or wheth	er you saw things you remembered from your	09:52
25	experien	ce with them?	09:52

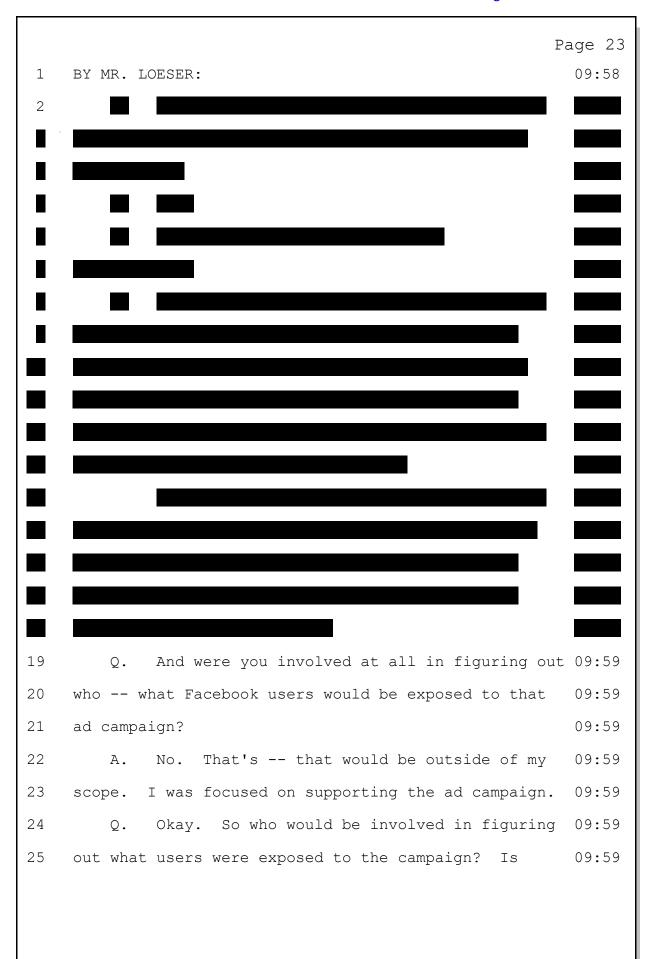
	Pa	age 18
1	A. Well, I saw the emails, but some of them I	09:52
2	don't really recall too well since it was it was	09:52
3	a little far back for me.	09:52
4	Q. And were these all emails that were where	09:52
5	you were the sender or the recipient?	09:52
6	A. I believe I was cc'd on them.	09:52
7	MR. LOESER: And, Counsel, we would ask that	09:52
8	you would, obviously, make sure that any material	09:52
9	that Miss Chang reviewed to prepare for this	09:52
10	deposition is produced or has been produced. Do you	09:52
11	know	09:53
12	Counsel, do you know if those materials have	09:53
13	all been produced?	09:53
14	MR. FALCONER: Yeah, they have.	09:53
15	BY MR. LOESER:	09:53
16	Q. And Miss Chang, did you review any of the	09:53
17	pleadings or filings in this case to prepare today?	09:53
18	A. No.	09:53
19	Q. Miss Chang, what is your understanding of	09:53
20	what this case is about?	09:53
21	MR. FALCONER: And, Miss Chang, I'm going to	09:53
22	instruct you here. If the only understanding you	09:53
23	have of what the case is about is something you	09:53
24	learned in conversations with counsel, don't reveal	09:53
25	what you learned in those conversations.	09:53

	Pa	age 19
1	If you have an independent understanding	09:53
2	outside of conversations with counsel, you're free	09:53
3	to share that.	09:53
4	THE WITNESS: Well, I believe everything I	09:53
5	know is from counsel.	09:53
6	BY MR. LOESER:	09:53
7	Q. Okay. You've never read anything about this	09:53
8	case in the newspaper or online or anything like	09:53
9	that?	09:53
10	A. Not specifically, no.	09:53
11	MR. LOESER: Counsel, I will just note for	09:53
12	the record that two days ago, Tuesday, December	09:54
13	14th, at 7:09 p.m. Pacific Time, Facebook made	09:54
14	production of 1,807 documents. That production	09:54
15	included 1,204 documents for which this deponent was	09:54
16	a custodian, an additional 65 documents where this	09:54
17	deponent was identified in the metadata or its	09:54
18	directed text.	
19	The produced documents from Miss Chang make	09:54
20	up over 25 percent of all the custodial documents we	09:54
21	have received for this deponent.	09:54
22	And I will just note for the record that we	09:54
23	reserve our right to recall this witness because of	09:54
24	this late production.	09:54
25	MR. FALCONER: Great. We'll reserve all	09:54

	Pag	ge 20
1	rights as well. 0	9:54
2	BY MR. LOESER: 0	9:54
3	Q. Miss Chang, what is your current position at 0	9:54
4	Facebook?	9:54
5	A. Director of academic partnerships. 0	9:54
6	Q. And how long have you had that position? 0	9:54
7	A. Since March. 0	9:54
8	Q. And who do you report to in that position? 0	9:54
9	A. Currently or	9:54
10	Q. Yes, currently.	9:55
11	A. Alvin Bowles. 0	9:55
12	Q. And what is his position?	9:55
13	A. VP of business ecosystem partnerships. 0	9:55
14	Q. And who reports to you currently?	9:55
15	A. Brina Collins, Christina Fan and Rachel 0	9:55
16	Mersey. 0	9:55
17	Q. And what are each of their jobs?	9:55
18	A. Product programs, research of partnerships 0	9:55
19	and academic programs. 0	9:55
20	Q. Miss Chang, what's the total amount of time 0	9:55
21	you've worked for Facebook?	9:55
22	A. 14 years, a little over.	9:55
23	MR. LOESER: We're going to show you what 0	9:55
24	will be marked Exhibit 2, which is your LinkedIn 0	9:55
25	resume, and we'll screen share that as well.	9:55

	P	age 21
1	(Exhibit 2 marked for identification.)	09:56
2	BY MR. LOESER:	09:56
3	Q. Miss Chang, I just want to quickly walk	09:56
4	through your resume. I would like to start at the	09:56
5	bottom at your initial experience at Facebook, which	09:56
6	is user operations and the time period is April 2007	09:56
7	to September 2007. Is that accurate?	09:56
8	A. Yes.	09:56
9	Q. And what is it that you did in user	09:56
10	operations during that timeframe?	09:56
11	A. I answered user tickets which were emailed	09:56
12	questions.	09:56
13	Q. So questions from Facebook users?	09:56
14	A. Correct.	09:56
15	Q. And what are the kinds of questions that	09:56
16	Facebook users would ask you?	09:56
17	A. I got locked out of my account. How do I	09:56
18	use this feature?	09:56
19	Q. And were you asked any questions about user	09:56
20	privacy and concerns users had about what was	09:57
21	happening to their content and information?	09:57
22	A. I don't remember specifically.	09:57
23	Q. And after user operations, you were the	09:57
24	global accounts manager, national direct sales, and	09:57
25	that's from 2007 to 2010; is that correct?	09:57
1		

		Page 22
1	A. Yes.	09:57
2	Q. And what is it that you did in that	09:57
3	position?	09:57
4		
7	Q. And what does it mean that you were the	09:57
8	account manager?	09:57
9	A. I would support the ad agency or brands	09:57
10	whenever they made an advertising buy to ensure that	t 09:57
11	their ad campaign ran as they bought it on our	09:57
12	platform.	09:57
13	Q. And were you involved in determining how	09:57
14	user content information was used in these ad	09:58
15	campaigns?	09:58
16	A. No.	09:58
17	Q. Did you have an understanding of what	09:58
18	content and information was used in ad campaigns?	09:58
19	A. Sorry, in what sense?	09:58
20	Q. How were ad campaigns operated?	09:58
21	MR. FALCONER: Objection. Form.	09:58
22	THE WITNESS: Sorry. I'm not sure. I gue	ss 09:58
23	that's hard to answer in a answer. In what	09:58
24	sense? In how I supported it or	09:58
25	/ / /	09:58



		Page 24
1	that how it would work, someone would advertise on	_
2	the platform, that ad would not go to everybody on	10:00
3	the platform, would it?	10:00
4	A. I'm not sure about the technical mechanics.	10:00
5	I would imagine the product team would know.	10:00
6	Q. And was being a global accounts manager a	10:00
7	promotion from user operations?	10:00
8	A. It was a lateral movement.	10:00
9	Q. And then from 2010 to 2014, you were the	10:00
10	strategic partner manager, social commerce and	10:00
11	developer platform. Tell me what you did there.	10:00
12		
16	Q. And was that position a promotion from	10:01
17	global accounts manager or a lateral?	10:01
18	A. Lateral.	10:01
19	Q. And how many different partners did you wor	k 10:01
20	with in your capacity as the manager?	10:01
21	A. I don't remember the specific number.	10:01
22	Q. Was it like hundreds, or a few, or what's	10:01
23	your recollection?	10:01
24	A. Sorry. Over over what period of time?	10:01
25	Q. [Audio distortion] 2007 to	10:01

		Page 25
1	A. Sorry. 2010 to 2014 or	10:01
2	Q. I'm sorry. 2010 to 2014, yeah.	10:01
3	A. I again, I don't remember the numbers	10:01
4	specifically, but could be in there, in maybe around	10:01
5	a hundred, I guess, over time. But not all managed	10:01
6	at once or anything.	10:02
7	Q. And, Miss Chang, what is social commerce ar	nd 10:02
8	developer platform?	10:02
9	A. Sorry. Can you can you repeat that?	10:02
10	Q. Yeah. I'm looking at your job title. It	10:02
11	includes the words "social commerce and developer	10:02
12	platform." Can you tell me what that is?	10:02
13	A. So the developer platform was something we	10:02
14	launched in 2007 which which provided APIs and	10:02
15		
24	Q. And are there other types of verticals other	er 10:03
25	than commerce verticals?	10:03
1		

		Page 26
1	A. That I managed directly or	10:03
2	Q. No, that just exist at Facebook.	10:03
3	A. Yes. There could be gaming, for example.	10:03
4	Q. And as best as you recall, can you just	10:03
5	describe for me the different verticals at Facebook	10:03
6	presently.	10:03
7	A. So presently, it's a bit different.	10:03
8	Q. Okay.	10:03
9	A. Yeah.	
10	Q. At this time, how many different verticals	10:04
11	were there in 2010 to 2014?	10:04
12	A. So I don't remember the specific number, bu	at 10:04
13	an example is like gaming, social media, I guess.	10:04
14	Sorry, I can't I can't remember all of them.	10:04
15	Q. Can you remember, what did you view as the	10:04
16	main categories of verticals at this time?	10:04
17	A. I was just mostly focused on social	10:04
18	commerce, which was the specific vertical I was	10:04
19	focused on. So I probably have less recollection	10:04
20	around other ones, but the ones that I can recall	10:04
21	right now is gaming, for example.	10:04
22	Q. Let's move to your next position, manager,	10:04
23	Internet.org and mobile inclusion partnerships, and	10:04
24	that's from 2014 to 2017; is that correct?	10:05
25	A. Correct.	10:05

	Pa	age 27
1	Q. And was that a lateral move also?	10:05
2	A. It was a lateral move with a promotion.	10:05
3	Q. And what did you do in that position,	10:05
4	Miss Chang?	10:05
5	A. My focus was to work with our Internet.org	10:05
6	product team, which was focused on launching new	10:05
7	connectivity initiatives to help connect parts of	10:05
8	the world that didn't have Internet access.	10:05
9	My group was specifically focused on content	10:05
10	so that when we enabled access, you know, we would	10:05
11	be able to bring in relevant local content.	10:05
12	Q. And so this was not just in the	10:05
13	United States, but in other countries as well?	10:05
14	A. Correct.	10:05
15	Q. So you were involved in content in other	10:06
16	countries that was published on the Facebook	10:06
17	platform?	10:06
18	A. No, I wouldn't state it that way. Content	10:06
19	in the sense of websites that we would enable access	10:06
20	via the Free Basics or Internet.org service. So it	10:06
21	wasn't related to the developer platform.	10:06
22	Q. And what are "mobile inclusion	10:06
23	partnerships"?	10:06
24	A. Mobile inclusion partnerships consisted of	10:06
25	working with non-profits. So, for example, we would	10:06

	Pa	age 28
1	work with like the WHO, who would focus on creating	10:06
2	content that was localized to help, you know,	10:06
3	perhaps a perhaps a very specific region within	10:06
4	Africa to drive awareness around malaria.	10:06
5	And so we would work with groups where there	10:07
6	wasn't content available to be able to localize it	10:07
7	and help address more of, like, you know, global	10:07
8	health issues or localized issues.	10:07
9	Q. And did you work with foreign governments in	10:07
10	this role as well?	10:07
11	A. I've interacted with them, but I didn't	10:07
12	formally do business or anything with them.	10:07
13	Q. So your next position was head of business	10:07
14	platform partnerships. Was that a promotion? It	10:07
15	sounds like a promotion.	10:07
16	A. I would say it was a lateral movement with a	10:07
17	promotion.	10:07
18	Q. And that was from 2017 through September of	10:07
19	2019; is that correct?	10:07
20	A. Correct.	10:07
21	Q. And tell me what you did in that role.	10:07
22	A. Sure. Shifting from Internet.org, I moved	10:07
23	over to focus around how we can enable more local	10:08
24	and small businesses through through like	10:08
25	features and offerings.	10:08

		Page 29
1	So, for example, you know, a local	10:08
2	restaurant, being able to help connect their	10:08
3	their online reservation system through Open Table	10:08
4	so people can make reservations via their page.	10:08
5	Q. And did you have particular clients or were	10:08
6	you just overseeing the operation?	10:08
7	A. So I didn't work with clients because this	10:08
8	was just platform offerings, so it was more of	10:08
9	integration with APIs. This is different than	10:08
10	advertising sales, which I haven't been in for a	10:08
11	while.	10:09
12	Q. Okay. And we'll get into questions about	10:09
13	APIs.	10:09
14	But so were you helping design what APIs	10:09
15	were made available to these partners on the	10:09
16	platform?	10:09
17	A. I did not design it. I'm not on the produc	t 10:09
18	team. I was mostly working with partners to help	10:09
19	drive adoption.	10:09
20	Q. And what did you do help drive adoption?	10:09
21		

	F	age 30
1		
3	Q. And then moving to your the next job from	n 10:09
4	that is the job you currently hold; is that right,	10:09
5	director of platform product partnerships?	10:09
6	A. Correct.	10:10
7	Q. And that entry in your resume starts with	10:10
8	"Research Platform/Academic Partnerships/Developer	10:10
9	Platform & Business Platform."	10:10
10	Can you explain what all that means	10:10
11	[Simultaneous talking]	
12	BY MR. LOESER?	
13	Q the tasks that you performed as the	10:10
14	director of platform product partnerships; is that	
15	right?	10:10
16	DEPOSITION REPORTER: Excuse me. Can you	10:10
17	repeat your question, please.	10:10
18	BY MR. LOESER:	10:10
19	Q. Yes. Are the line in your resume that	10:10
20	starts, "Research Platform/Academic Partnerships,	10:10
21	Developer Platform & Business Platform," is that a	10:10
22	description of what it is that you are doing as the	10:10
23	director of platform product partnerships?	10:10
24	A. Correct. But I haven't updated it to my	10:10
25	most recent, which is now I'm fully focused on	10:10

	Pa	age 31
1	academic partnerships since March.	10:10
2	Q. Okay. Well, let's talk about what's in your	10:10
3	LinkedIn resume right now.	10:10
4	Can you please explain to me what it is that	10:11
5	you are doing as the director of platform product	10:11
6	partnerships before your current transition to just	10:11
7	dealing with academic partnerships?	10:11
8	A. Yes. I would work with product teams,	10:11
9	product teams that include business platform, which	10:11
10	is that, yeah, the example I gave you around Open	10:11
11	Table. I came back to support the developer	10:11
12	platform through its login service, and what that	10:11
13	meant was working with the product team to help them	10:11
14	with their go-to-market strategy so that we could	10:11
15	work with the actual partnerships' teams that were	10:11
16	in market to ensure that they had the right	10:11
17	materials to be able to connect and connect with	10:11
18	partners and, you know, help them to adopt these	10:11
19	products.	10:11
20	Q. What do you mean by the "right materials"?	10:11
21	A. "Right materials" meaning ensuring that they	10:12
22	had the right marketing language, meaning just	10:12
23	because you create something, if you can't talk	10:12
24	about it and market it correctly, people wouldn't be	10:12
25	able to understand it.	10:12
1		

	Pa	age 32
1	So ensuring that partner managers who are on	10:12
2	the ground would have the right information to	10:12
3	connect with partners to help them understand what	10:12
4	the product was.	10:12
5	Q. And this describes your role as to research	10:12
6	these different platforms. What did you do to	10:12
7	research the platforms?	10:12
8	A. So currently, I work with the Facebook Open	10:12
9	Research and Transparency Team, where they've	10:12
10	developed researcher APIs so that we can now enable	10:12
11	privacy preserved measures to allow researchers to	10:12
12	use that data for their studies.	10:12
13	Q. And what are explain to me what	10:13
14	privacy what was the description, of the	10:13
15	measures? Privacy what?	10:13
16	A. Privacy preserving measures. So I'm not the	10:13
17	technical or product owner, so I'll specify that.	10:13
18	But high level, you know, in ensuring that, you	10:13
19	know, information is going through a virtual clean	10:13
20	room, differential privacy applied. I am not an	10:13
21	expert in this, so I don't know the details of how	10:13
22	it all works.	10:13
23	Q. And is this a new task or is this something	10:13
24	that someone else did before you did it?	10:13
25	A. I'm not sure I understand.	10:13

	Pa	age 33
1	Q. This privacy preserving structure, is that	10:13
2	something new, or is that something that previously	10:13
3	existed?	10:13
4	A. So that was created by the product team.	10:13
5	What my team focused on is working with researchers	10:13
6	to drive adoption for that product. So I can't	10:14
7	speak to that the specifics of the history of	10:14
8	that product.	10:14
9	Q. And how do researchers drive adoption of the	10:14
10	product?	10:14
11	A. They're able to go through the Facebook Open	10:14
12	Research and Transparency, or FORT, environment and,	10:14
13	you know, they can apply for access. And we work	10:14
14	with researchers when they apply for access and help	10:14
15	get them set up so they can access those APIs or	10:14
16	sorry, not APIs, datasets.	10:14
17	Q. Miss Chang, when did you transition to your	10:14
18	current role?	10:14
19	A. March	10:14
20	Q. I'm sorry. Go ahead.	10:14
21	A. March 2021.	10:14
22	Q. Okay. And so did someone take over the task	10:14
23	that you previously were responsible for?	10:14
24	A. Yes. It transferred over to another team.	10:15
25	Q. And what team was that?	10:15

	Pa	age 34
1	A. The the acronym is PPM, but I'm trying to	10:15
2	recall what the "PPM" stands for. Product partner	10:15
3	marketing.	10:15
4	Q. And who runs that team?	10:15
5	A. Kelly Stonelake.	10:15
6	Q. Have you worked with is Kelly a man or a	10:15
7	woman?	10:15
8	A. I believe she she's a she.	10:15
9	Q. And had you worked with her before as the	10:15
10	director of platform product partnerships?	10:15
11	A. Yes.	10:15
12	Q. Are there any other jobs or roles that you	10:15
13	performed at Facebook that are not covered by the	10:15
14	resume that we just went through?	10:16
15	A. In what sense? Do you mean like sorry.	10:16
16	Q. Did you have any other positions other than	10:16
17	the ones that are listed there?	10:16
18	A. No.	10:16
19	Q. During the time that you have worked for	10:16
20	Facebook, what software systems have you used to	10:16
21	communicate with your colleagues?	10:16
22	A. Sorry. I don't understand.	10:16
23	Q. How did you communicate with your colleagues	10:16
24	over the past 14 years at Facebook?	10:16
25	A. Well, I think it depends on what year it	10:16

	Pa	age 35
1	was. When I first started, you know, we would	10:16
2	have we would use Facebook Chat, and then we	10:16
3	would we evolved to Workplace Chat, and then	10:16
4	email.	10:16
5	Q. Okay. So you have described three different	10:16
6	things. Are there any other I'm calling them	10:17
7	"systems," you might call them something else.	10:17
8	Are there any other systems that you used to	10:17
9	communicate with your colleagues?	10:17
10	A. Not that I recall.	10:17
11	Q. For example, did you use Slack?	10:17
12	A. No. Well, I haven't used Slack, but I can't	10:17
13	speak for others.	10:17
14	Q. WIP, do you use WIP?	10:17
15	A. Yes. But I don't think that's a	10:17
16	communication tool. More of a document tool.	10:17
17	Q. Okay. Let's expand have we covered all	10:17
18	the different communication tools that you've used	10:17
19	over the last 14 years?	10:17
20	A. To my understanding. I don't know if you	10:17
21	would classify other types but, yes, email and work	10:17
22	chat.	10:17
23	Q. I assume you talk to your employees; right,	10:17
24	to your	10:17
25	A. Oh, yes. I guess, yeah, verbal.	10:17

		Pa	age 36
1	Q.	And did you chat with them using your phone?	10:18
2	Α.	Through apps like Workplace.	10:18
3	Q.	But not just using what kind of phone	10:18
4	have you	had over the last 14 years? Is it an	10:18
5	iPhone?		10:18
6	А.	An Apple iPhone.	10:18
7	Q.	And did you use the chat feature on your	10:18
8	iPhone t	o communicate with others?	10:18
9	Α.	Sorry, which chat feature?	10:18
10	Q.	On your iPhone is there a chat feature on	10:18
11	your iPh	one?	10:18
12	A.	I've used I've used the Workplace Chat	10:18
13	applicat	ion.	10:18
14	Q.	How about texting? Did you text on your	10:18
15	iPhone w	ith your colleagues regarding work?	10:18
16	Α.	No.	10:18
17	Q.	You never texted your colleagues with your	10:18
18	iPhone?		10:18
19		MR. FALCONER: Objection. Asked and	10:18
20	answered	•	10:18
21	BY MR. L	OESER:	10:18
22	Q.	I'm sorry. You did not text your colleagues	10:18
23	for work	-related matters on your iPhone	10:18
24	Α.	Oh, for work, no.	10:19
25	Q.	Did you ever utilize a personal email	10:19

		Page 37
1	account for work-related communications?	10:19
2	A. No.	10:19
3	Q. Did you ever send anything from your work	10:19
4	account to your home account to save it for any	10:19
5	particular reason?	10:19
6	A. I mean, I believe I've accidentally sent	10:19
7	something to my personal email just because it may	10:19
8	have auto-populated, but not intentionally.	10:19
9	Q. Okay. So you never thought this is worth	10:19
10	saving or this is important, I'm going to send it to	0 10:19
11	my home address?	10:19
12	A. No.	10:19
13	Q. Now, we went over your whole time and work	10:19
14	for Facebook. And it sounds like you have done some	e 10:19
15	work directly involving users; is that right?	10:19
16	That's where you started?	10:19
17	A. Yes, interacting with users in user	10:19
18	operation.	10:19
19	Q. And you also had a position where you	10:19
20	interacted with advertisers; is that right?	10:19
21	A. Correct. Working with advertisers in the	10:19
22	global national sales.	10:20
23	Q. And you also had positions where you	10:20
24	interacted with partners; is that right?	10:20
25	A. Correct.	10:20

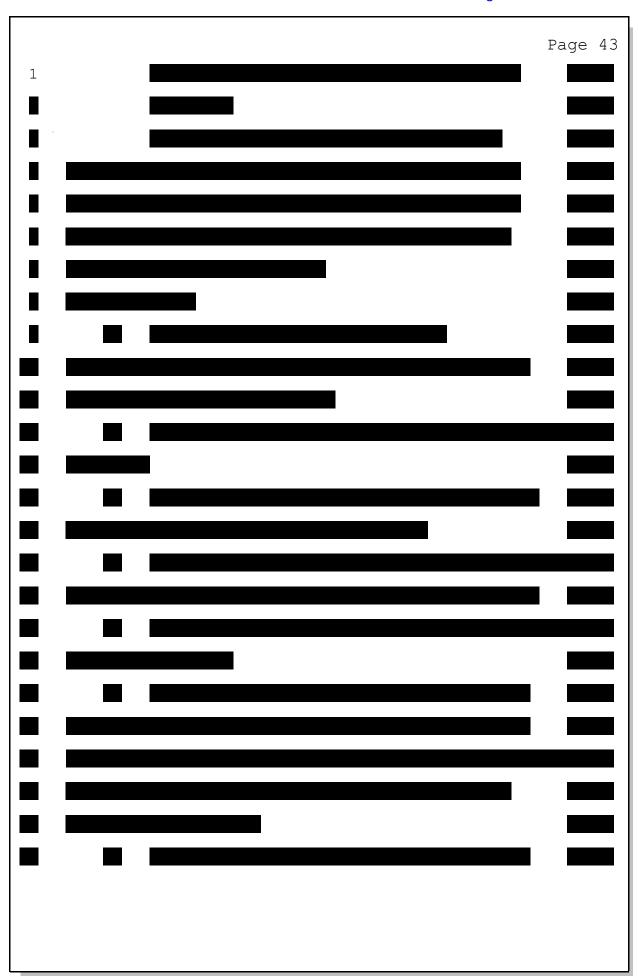
	Pa	age 38
1	Q. Now, is there any other category of entities	10:20
2	that utilize Facebook that you interacted with other	10:20
3	than those? Does that cover everything, or are	10:20
4	there other types of Facebook partners or actors?	10:20
5	Do you understand what I'm asking?	10:20
6	A. Can you give an example?	10:20
7	Q. You've interacted with users, you've	10:20
8	interacted with advertisers, you've interacted with	10:20
9	partners.	10:20
10	Is there any other category you've	10:20
11	interacted with or does that cover everything?	10:20
12	A. I think so.	10:20
13	Q. You think that covers everything?	10:20
14	A. Well, I don't know how you sorry, I'm	10:20
15	trying to understand the full definition. But to my	10:20
16	knowledge, yes. Yeah.	10:20
17	Q. And you clearly have a lot of experience	10:20
18	with working with partners; is that right?	10:20
19	A. Correct.	10:20
20	Q. Have you been involved in helping form any	10:21
21	policies or procedures at Facebook?	10:21
22	A. In what sense?	10:21
23	Q. In any of the different types of users,	10:21
24	advertisers, partners, were you involved in helping	10:21
25	create policy for any of those groups?	10:21
1		

	P	age 39
1	A. No.	10:21
2	Q. Do you have particular things that you would	10:21
3	consider major accomplishments for yourself at	10:21
4	Facebook?	10:21
5	A. I would say the time here in itself and, you	10:21
6	know, working with you know, working with	10:21
7	partners on new innovative things, you know, such as	10:21
8		
12	know, new access in different regions of the world.	10:22
13	And then now working with researchers trying to	10:22
14	enable that that area too.	10:22
15	Q. And do you feel like you have been able to	10:22
16	influence how Facebook does business with its	10:22
17	partners?	10:22
18	A. In what sense?	10:22
19	Q. In the sense of evolving or changing their	10:22
20	practices or innovating their practices.	10:22
21	A. I guess it's a little broad, but in the	10:22
22	sense that I'm able to help the partners achieve the	10:22
23	goals where it makes sense, yes.	10:22
24	Q. How is the term "partner" used by Facebook?	10:22
25	A. Partner is someone that Facebook is working	10:23

	Pa	age 40
1	with. It doesn't necessarily mean that there's a	10:23
2	monetary exchange, but someone that we would	10:23
3	collaborate with for a larger goal or objective.	10:23
4	Q. And sometimes there's a monetary exchange	10:23
5	with partners?	10:23
6	A. Advertisers, for example, would be a	10:23
7	partner.	10:23
8	Q. Are there other types of partners for which	10:23
9	there is a monetary exchange?	10:23
10	A. I don't know in full depth. It's possible.	10:23
11	Q. What do you mean by "monetary exchange"?	10:23
12	A. I guess that's what I meant by I don't know	10:23
13	fully. So my understanding in terms of advertising,	10:23
14	like if you buy advertising, in that sense.	10:23
15	Q. So people spending money paying Facebook	10:23
16	money; right? Is that what advertisers do?	10:23
17	A. Yeah. Not people, but advertisers.	10:24
18	Q. Okay. And are there partners where Facebook	10:24
19	pays the partners money?	10:24
20	A. I imagine there is, but I don't work on that	10:24
21	directly.	10:24
22	Q. But can you identify any of those types of	10:24
23	partners?	10:24
24	A. No, I don't know specifically.	10:24
25	Q. What are the different types of partners	10:24

		Page 41
1	that you're aware of?	10:24
2	A. I would say the ones you've listed,	10:24
3	advertisers advertisers, developers, anyone that	10:24
4	we worked with in that sense.	10:24
5		
14	Q. So partners can be advertisers; right?	10:25
15	A. Yes, correct.	10:25
16		

		Page 42
1	And then I also worked with them when I	10:26
2	moved over to developer platform when they	10:26
3	integrated the Like button plugin.	10:26
4		
13	MR. FALCONER: Objection. Form.	10:26
14	THE WITNESS: Sorry.	
15	MR. FALCONER: I objection. Form.	10:26
16	Go ahead.	10:26
17	BY MR. LOESER:	
18	Q. Do you have	
19		



1			Page 44
I			
11	BY MR. LOESE	ER:	10:28
12	Q. Are	e app developers considered partners?	10:28
13	A. Yes	s, if yes.	10:28
14	Q. And	d do you know what "data brokers" are?	10:28
15	A. Lik	e generally or	10:28
16	Q. Yes	s, generally.	10:29
17	A. Yes	S.	10:29
18	Q. Wha	at are data brokers?	10:29
19	A. The	ey are an entity that may facilitate the	10:29
20	trade of dat	ca.	10:29
21	Q. Oka	ay. And they're considered partners as	10:29
22	well at Face	ebook?	10:29
23	A. I o	don't know. I don't work with data	10:29
24	brokers.		10:29
25	Q. Do	you know you mentioned the monetary	10:29

	Pa	age 45
1	exchange aspect. Do you know if there was a	10:29
2	monetary exchange between Facebook and data brokers?	10:29
3	A. I don't know.	10:29
4	Q. Are advertisers sometimes also app	10:29
5	developers?	10:29
6	A. Yes.	10:29
7	Q. Miss Chang, why does Facebook have partners?	10:29
8	A. I think that depends in terms of so	10:29
9	Facebook is hard to generalize as one entity. It's	10:30
10	made up of, you know, different groups trying to	10:30
11	drive different goals. And I would say related to	10:30
12	different goals, they may partner to help achieve	10:30
13	that goal. So I can't speak to what every	10:30
14	individual team's goals are.	10:30
15	Q. So let's just think in terms of the partners	10:30
16	with which you've been involved.	10:30
17	A. Okay.	10:30
18	Q. Why does Facebook have those partnerships?	10:30
19	DEPOSITION REPORTER: Excuse me. I lost the	10:30
20	last word. "Why does Facebook"	10:30
21	BY MR. LOESER:	10:30
22	Q have those partnerships?	10:30
23		

		Page 46
1		
13	Q. And wasn't another purpose for Facebook to	10:31
14	collect information about the user for its own use?	10:31
15	A. I don't know. That would be a bit outside	10:31
16	of my my specific role.	10:31
17	Q. Facebook shared user content information	10:32
18	with partners; is that right?	10:32
19	A. In what sense?	10:32
20	Q. Well, I'm asking you, in your role involved	d 10:32
21	in all the capacities dealing with partners, was	10:32
22	there a sharing of user content information	10:32
23	MR. FALCONER: Objection. Form.	10:32
24	THE WITNESS: So we would have public APIs,	, 10:32
25	where if people consented, you know, I believe they	10:32

		Page 47
1	would be able to provide that data to the	10:32
2	application developer.	10:32
3	BY MR. LOESER:	10:32
4	Q. Okay. And so through the API, a partner	10:32
5	could obtain user content information about users;	10:32
6	is that right?	10:32
7	MR. FALCONER: Objection. Form.	10:32
8	THE WITNESS: I think that depends. I	10:32
9	wouldn't generalize it to that because it would be	10:32
10	dependent on what the developer created and what	10:33
11	they were approved to use.	10:33
12	BY MR. LOESER:	10:33
13	Q. Okay. But there were partners that were	10:33
14	approved to have access to various API permissions;	10:33
15	is that right?	10:33
16	MR. FALCONER: Objection. Form.	10:33
17	THE WITNESS: I imagine so.	10:33
18	BY MR. LOESER:	10:33
19	Q. And don't you, in fact, know so from your -	- 10:33
20	from the work you did with partners?	10:33
21	MR. FALCONER: Objection. Form and asked	10:33
22	and answered.	10:33
23	THE WITNESS: So for specific partners for	10:33
24	specific permissions, yes, but I thought you were	10:33
25	trying to speak to it more generally, which I didn't	10:33

	P	age 48
1	manage generally. There was an operations team for	10:33
2	that.	10:33
3	BY MR. LOESER:	10:33
4	Q. And when Facebook shares when Facebook	10:33
5	shares user information with a third party, what	10:33
6	does that mean to you?	10:33
7	A. I think it depends on what specific what	10:33
8	specific group. So in the context of my experience	10:34
9	on the developer platform, it would be through the	10:34
10	developer APIs and the permissions there.	10:34
11	Q. Okay. And I just want to make sure I	10:34
12	understand how you use the terminology.	10:34
13	Through the APIs APIs are a way for a	10:34
14	third party that has permission to obtain various	10:34
15	categories of information that Facebook has	10:34
16	collected about the user; is that right?	10:34
17	MR. FALCONER: Objection. Form.	10:34
18	Go ahead.	10:34
19	THE WITNESS: Sorry. Can you restate that?	10:34
20	MR. LOESER: Why don't we just repeat the	10:34
21	question. Would you read the question back, please,	10:34
22	Miss Jennings.	10:34
23	(Record read as follows:	10:34
24	"Q. Okay. And I just want to make sure	10:34
25	I understand how you use the terminology.	10:34

		Page 49
1	Through the APIs APIs are a way for a	10:34
2	third party that has permission to obtain	10:34
3	various categories of information that	10:34
4	Facebook has collected about the user;	10:34
5	is that right?")	
6	THE WITNESS: No.	10:35
7	MR. FALCONER: Same objection.	10:35
8	BY MR. LOESER:	10:35
9	Q. So APIs are a way for a third party to	10:35
10	obtain various categories of information that	10:35
11	Facebook has collected about a user; correct?	10:35
12	A. Yes. It's a it's a vehicle, but I	10:35
13	wouldn't necessarily say again, I'm not a	10:35
14	technical person. I don't know if that's all	10:35
15	technically how it's done, but to my understanding,	10:35
16	it sounds right.	10:35
17	Q. Are you familiar with the concept at	10:35
18	Facebook of reciprocity?	10:35
19	A. Yes.	10:35
20	MR. FALCONER: Objection. Form.	10:35
21	Go ahead.	10:35
22	BY MR. LOESER:	10:35
23	Q. Can you explain to me how Facebook uses the	e 10:35
24	term reciprocity with particularly with respect	10:35
25	to partners?	10:36

	P	age 50
1	MR. FALCONER: Same objection.	10:36
2	THE WITNESS: My understanding of	10:36
3	reciprocity is a value exchange.	10:36
4	BY MR. LOESER:	10:36
5	Q. And explain what you mean by that.	10:36
6	A. "Value" meaning and it doesn't	10:36
7	necessarily mean monetary. So, you know, going back	10:36
8	to partnerships, ensuring that if we're going to	10:36
9	partnerships, there's value in that experience.	10:36
10		
15	Q. So is value another way of saying	10:36
16	information? So when there's value when there is	10:36
17	reciprocity with a partner, that means that Facebook	10:36
18	is giving that partner some information about users,	10:36
19	and Facebook is obtaining from that partner some	10:37
20	information about users; is that right?	10:37
21	A. Not to my understanding.	10:37
22	Q. It's not your understanding that in exchange	10:37
23	for providing information, Facebook gets back	10:37
24	information?	10:37
25	A. Well, I think it's dependent. So when I was	10:37

		P	age 51
1	talking	about the value exchange, it doesn't have to	10:37
2	be infor	rmation. Value can be in the sense of like	10:37
3	experier	nce. So if the experience is making the user	10:37
4	experier	nce better, meaning it brings like delight to	10:37
5	a user,	then that's also an exchange in value.	10:37
6	Q.	However, it is sometimes an exchange of	10:37
7	informat	cion; is that correct?	10:37
8	Α.	Yes. It could be.	10:37
9			
24	Α.	I don't know.	10:38
25	Q.	Do you know anything about how it studies	10:38

	Po	age 52
1	Facebook studies that information or analyzes it?	10:38
2	A. No. That would be outside my scope.	10:38
3	Q. Do you know if, in fact, information that is	10:38
4	published back is studied and analyzed by Facebook?	10:38
5	A. I don't know.	10:38
6	Q. You don't know if that happens, or you just	10:38
7	don't know anything about it?	10:38
8	A. I just don't know. It is outside my scope	10:38
9	so I can't really speak to it.	10:38
10	Q. And Miss Chang, you worked with partners	10:38
11	with whom there was reciprocity; is that right?	10:39
12	A. In what sense?	10:39
13	MR. FALCONER: Objection to form.	10:39
14	BY MR. LOESER:	10:39
15		
24	Q. It's an important concept to Facebook;	10:39
25	right?	10:39

	Pa	age 53
1	A. I don't know.	10:39
2	Q. Were you involved in making sure that there	10:39
3	was reciprocity with partners with whom you worked?	10:39
4	A. I don't know in the sense that I I'm not	10:39
5	sure I understand.	10:39
6	Q. Well, did you ever, for example, communicate	10:39
7	to your colleagues that some interaction with a	10:39
8	partner was positive because there was progress with	10:40
9	reciprocity?	10:40
10	A. I'm not sure I understand. So when I would	10:40
11	work with a partner, I would try to ensure that I'm	10:40
12	always representing the voice of a partner	10:40
13	holistically, meaning the different ways that we're	10:40
14	working with them, the things that would impact	10:40
15	their business. Not necessarily in the scope of	10:40
16	reciprocity.	10:40
17	Q. But you would also want to make sure that if	10:40
18	Facebook was giving content information to the	10:40
19	partner, that Facebook was getting back some	10:40
20	information; isn't that correct?	10:40
21	A. I didn't regulate that. Well, I guess I'm	10:40
22	having a hard time understanding. Like I don't	10:40
23	regulate that.	10:40
24	Q. You don't recall any examples of where you	10:40
25	were endeavoring to encourage reciprocity?	10:41

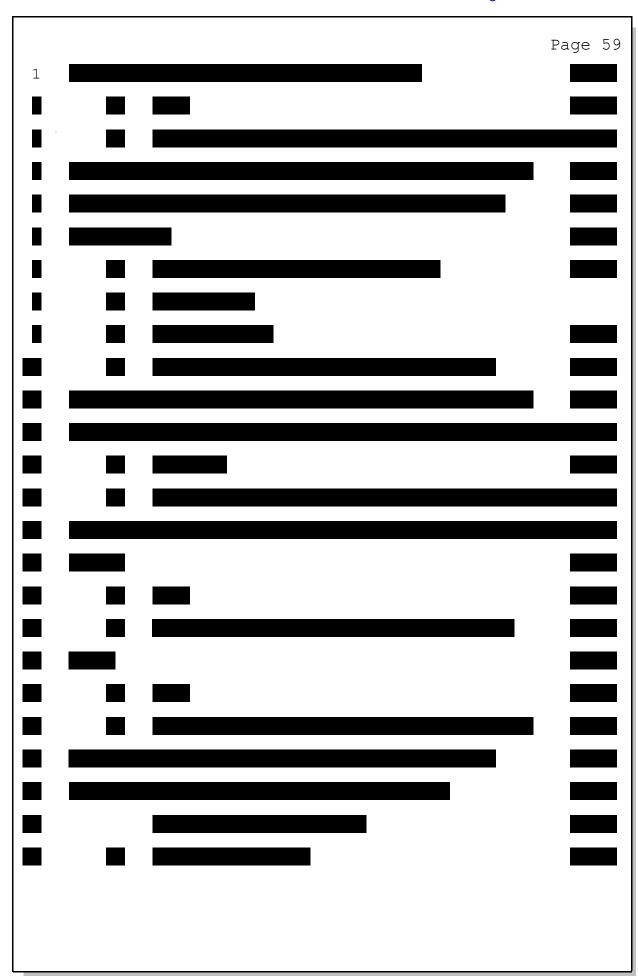
	P	age 54
1	A. I'm not sure I understand.	10:41
2	Q. Miss Chang, are some partners considered	10:41
3	more valuable to Facebook than other partners?	10:41
4	A. I guess in the I guess it depends on what	10:41
5	specific initiative or project. I wouldn't say it's	10:41
6	one holistic stack rank.	10:41
7	Q. Okay. Can you think of any any	10:41
8	characteristics of a partner that would make it more	10:41
9	valuable to Facebook than other partners?	10:41
10		
19	Q. So is a partner that publishes back a lot of	10:42
20	content information considered a valuable partner	10:42
21	for Facebook?	10:42
22	MR. FALCONER: Objection. Form.	10:42
23	BY MR. LOESER:	
24	Q. Taking into account on determining whether	10:42
25	that was a valuable partner?	10:42

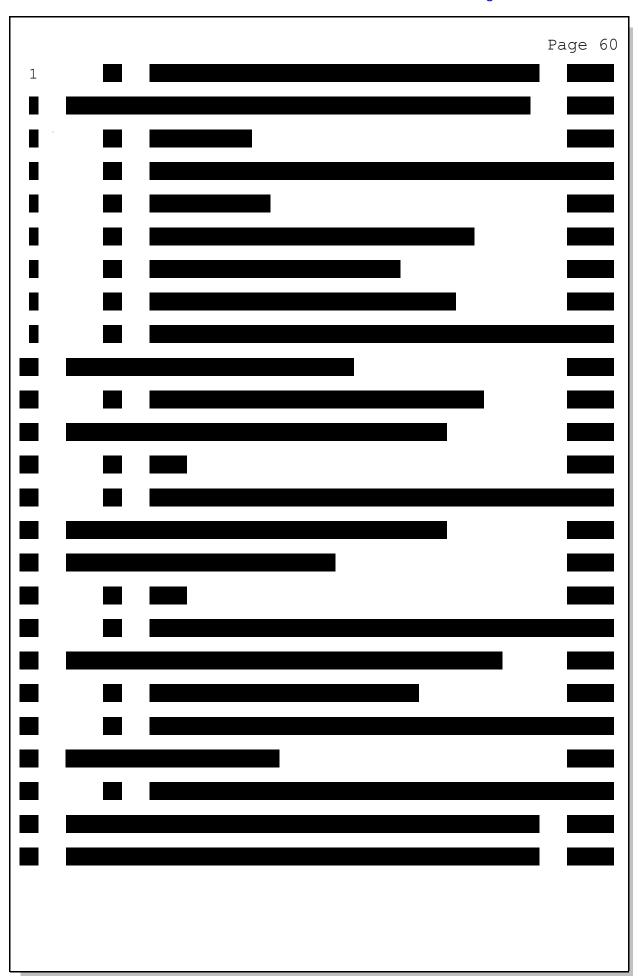
	P	age 55
1	MR. FALCONER: Same objection.	10:42
2	THE WITNESS: Again, I don't know. And I	10:42
3	guess it's kind of hard to generalize it, so I don't	10:42
4	know.	10:42
5	BY MR. LOESER:	10:42
6	Q. So is the value of a partner based on how	10:42
7	much user content information Facebook obtains from	10:42
8	a partner?	10:42
9	MR. FALCONER: Objection. Form. And asked	10:42
10	and answered.	10:42
11	THE WITNESS: I don't know.	10:42
12	BY MR. LOESER:	10:42
13	Q. Miss Chang, are some partners considered	10:43
14	vendors?	10:43
15	A. Yes. Yeah.	10:43
16	Q. So what would a "vendor" be?	10:43
17	A. A vendor would be sorry. A vendor would	10:43
18	be someone we buy services from.	10:43
19	Q. Okay. And can you think of any examples of	10:43
20	services that Facebook buys?	10:43
21		
24	Q. So they would provide a service? That	10:43
25	particular type of partner would provide a service	10:43

	E	Page 56
1	to Facebook?	10:43
2	A. That partner in the advertising capacity	10:43
3	could also be a vendor.	10:43
4	Q. And a lot of partner arrangements, the	10:43
5	information the partner obtains from Facebook is	10:44
6	used to support that partner's business; is that	10:44
7	right?	10:44
8	MR. FALCONER: Objection. Form.	10:44
9	THE WITNESS: Sorry. I don't understand.	10:44
10	Can you can you say it another way or	10:44
11	BY MR. LOESER:	10:44
12	Q. What is your understanding of what a partner	10:44
13	does when it obtains user content information from	10:44
14	Facebook?	10:44
15	MR. FALCONER: Objection. Form.	10:44
16	THE WITNESS: I don't know. If there's	10:44
17	something more specific	10:44
18	BY MR. LOESER:	10:44
19	Q. Do you know anything about how Facebook uses	3 10:44
20	user content information in its advertising	10:44
21	business?	10:44
22	A. No, not technically.	10:44
23	Q. Do you know anything about how Facebook	10:44
24	monetizes information that it obtains from its	10:45
25	partners?	10:45

		Daga 57
1	MR. FALCONER: Objection. Form.	Page 57 10:45
	-	
2	Go ahead.	10:45
3	THE WITNESS: Not specifically.	10:45
4	BY MR. LOESER:	10:45
5	Q. Well, generally, do you know?	10:45
6	A. No. I don't well, I don't know in the	10:45
7	capacity that sorry, if you can give me an	10:45
8	example.	10:45
9	Q. Was that something that you ever discusse	d 10:45
10	with your colleagues, how Facebook monetizes	10:45
11	information?	10:45
12	A. No, not that I that I recall.	10:45
13	Q. Do you know what group at Facebook manage	d 10:45
14	the relationship with data brokers?	10:45
15	A. No.	10:45
16	Q. Do you know if data brokers were ever app	10:45
17	developers for Facebook?	10:46
18	A. I don't know.	10:46
19	Q. Do you know if data brokers were ever	10:46
20	advertisers for Facebook?	10:46
21	A. I don't know.	10:46
22	MR. LOESER: I will show you what we will	10:46
23	mark as Exhibit 3. We will screen share that as	10:46
24	well.	10:46
25	(Exhibit 3 marked for identification.)	10:46
	(Zimizore o marmea for facilitateron.)	10.10

			Page 58
1	BY MR. I	LOESER:	10:46
2	Q.	This is an email from and I'm not sure	10:46
3	I'm sayi	ing this name right. Ime Archibong. Do you	10:46
4	know who	that is?	10:46
5	А.	Yes, Ime Archibong.	10:46
6	Q.	Ime Archibong. What is Ime Archibong's job	? 10:46
7	А.	At this time or	10:46
8	Q.	Yes.	10:46
9	Α.	I believe he was the director of platform	10:47
10	partners	ships.	10:47
11	Q.	Okay. So someone who had the job before	10:47
12	you?		10:47
13	Α.	I didn't have that job.	10:47
14	Q.	So the Exhibit 3 is an email from Ime	10:47
15	Archibor	ng to you, dated September 30th, 2013; right?	10:47
16	Α.	Sorry. Can you repeat that? I was also	10:47
17	reading	the email.	10:47
18	Q.	I'm just identifying this exhibit for the	10:47
19	record.	And it is an email from Ime Archibong to	10:47
20	you date	ed September 30th, 2013; is that correct?	10:47
21	А.	Yes, correct.	10:47
22	Q.	And do you see the subject line on that	10:47
23	email?		10:47
24	Α.	Yes.	10:47
25			





	Pa	age 61
1		
12	Q. What about data that was sold by Facebook?	10:51
13	Were you involved at all with that?	10:51
14	A. No.	10:51
15	Q. And are you aware of any data that was sold	10:51
16	by Facebook?	10:51
17	A. Not to my knowledge, no.	10:51
18	MR. FALCONER: Derek, can we take a quick	10:52
19	break whenever you are done with this document?	10:52
20	MR. LOESER: Sure. Now is fine.	10:52
21	MR. FALCONER: All right.	10:52
22	MR. LOESER: You want 10 minutes? 15	10:52
23	minutes?	10:52
24	MR. FALCONER: Yeah.	10:52
25	THE VIDEOGRAPHER: This marks the end of	10:52

	Pa	age 62
1	media No. 1 in the deposition of Jackie Chang.	10:52
2	Going off the record. The time is 10:52.	10:52
3	(Off the record.)	10:52
4	THE VIDEOGRAPHER: This marks the beginning	11:14
5	of media No. 2 in the deposition of Jackie Chang.	11:14
6	We are back on the record. The time is 11:14.	11:14
7	BY MR. LOESER:	11:14
8	Q. Miss Chang, Facebook collects content and	11:14
9	information about its users from its partners and	11:14
10	uses that information in its advertising business;	11:14
11	is that correct?	11:14
12	MR. FALCONER: Objection. Form.	11:14
13	THE WITNESS: I can't speak to that broadly,	11:14
14	meaning I don't know the technical specifics to be	11:14
15	able to support that statement.	11:15
16	BY MR. LOESER:	11:15
17	Q. But do you know that generally to be the	11:15
18	case, Miss Chang?	11:15
19	A. No. I I don't really feel comfortable	11:15
20	answering because I don't know.	11:15
21	Q. Do you know how Facebook makes money?	11:15
22	A. My understanding is advertising.	11:15
23	Q. And do you know whether advertising collects	11:15
24	and uses user content and information?	11:15
25	MR. FALCONER: Objection. Form.	11:15

	Pā	age 63
1	THE WITNESS: I don't know, meaning I don't	11:15
2	understand the product mechanics around that.	11:15
3	BY MR. LOESER:	11:15
4	Q. What do you understand about the advertising	11:15
5	business at Facebook?	11:15
6	A. Not much since I haven't worked on it since	11:15
7	2010.	11:15
8	Q. Do you know what portion of Facebook's	11:15
9	revenue comes from its advertising business?	11:15
10	A. Not specifically.	11:15
11	Q. Do you have any idea at all?	11:15
12	A. I think a good portion.	11:16
13	Q. And does the advertising business utilize in	11:16
14	any way, as far as you understand it, content and	11:16
15	information that Facebook collects from its	11:16
16	partners?	11:16
17	MR. FALCONER: Objection. Form.	11:16
18	THE WITNESS: Again, I don't know enough	11:16
19	about the technical specifics to make that	11:16
20	assertion. I don't know.	11:16
21	BY MR. LOESER:	11:16
22	Q. Well, I'm not asking about the technical	11:16
23	specifics, just the general concept. Is that	11:16
24	something you understand?	11:16
25	A. I don't know.	11:16

	Pa	age 64
1	Q. Miss Chang, are people who create apps for	11:16
2	Facebook called "developers"?	11:16
3	A. Yes.	11:16
4	Q. Are there other types of developers?	11:16
5	A. I only know of app developers.	11:16
6	Q. And we mentioned APIs before, but can you	11:17
7	please just explain what "APIs" are.	11:17
8	A. Application programming interface. It's a	11:17
9	way for, you know, two two services to connect	11:17
10	and speak to each other.	11:17
11	Q. And how does Facebook use APIs with regard	11:17
12	to user content and information?	11:17
13	A. I'm not sure I understand the question.	11:17
14	Q. Do you understand how Facebook uses APIs at	11:17
15	all?	11:17
16	A. Well, Facebook doesn't use the APIs. The	11:17
17	developer so, sorry, can you be a little more	11:17
18	specific?	11:17
19	Q. Yeah. How do APIs work at Facebook on its	11:17
20	platform?	11:17
21	A. I think that depends because APIs can be	11:17
22	used in a lot of different cases. Are you speaking	11:17
23	to developer platform or?	11:18
24	Q. Yes. How are how do third parties access	11:18
25	user content information through APIs?	11:18

	Pa	age 65
1	A. So they can go through our developer	11:18
2	platform and go through the process of approvals and	11:18
3	submitting their app to access APIs.	11:18
4	Q. Explain that process in as much detail as	11:18
5	you can.	11:18
6	A. Unfortunately, I can't. I don't work on the	11:18
7	operations side. So generally, we prefer them to go	11:18
8	through the flow, and that flow is managed by on	11:18
9	the product and operation side. So I can't speak to	11:18
10	the exact process.	11:18
11	Q. Okay. You are familiar with the different	11:18
12	sorts of APIs that Facebook provides for its	11:18
13	third-party access to	11:18
14	A. Sorry, you broke up. Can you say that	11:18
15	again?	11:18
16	Q. Have you ever looked at a list of APIs that	11:18
17	are that app developers can use if they have	11:19
18	permission to do so?	11:19
19	A. I have looked at developer.Facebook.com,	11:19
20	which has a list of APIs.	11:19
21	Q. Okay. And are you familiar with any of	11:19
22	those APIs?	11:19
23	A. I don't probably not, since it's been a	11:19
24	couple years since I've worked on that directly.	11:19
25	Q. For example, are you familiar with the	11:19

	Pa	ıge 66
1	friends permission APIs?	11:19
2	A. I know what the name is, but I don't know	11:19
3	like the specifics around it.	11:19
4	Q. What do you know about it?	11:19
5	A. I've heard of it, like I've seen the name	11:19
6	like in emails, but I don't remember what it exactly	11:19
7	does and the technical specifics of it.	11:19
8	Q. Do you know what information the friends API	11:19
9	permissions allow a third party to access?	11:20
10	A. I don't recall specifically.	11:20
11	Q. In order to have access to APIs, what does a	11:20
12	developer need to do?	11:20
13	A. So I think that depends. Are you talking	11:20
14	about just the developer platform workflow or	11:20
15	Q. We can start there, yeah.	11:20
16	A. Sure. On developer platform, they would go	11:20
17	to developer.Facebook.com, go through the documents	11:20
18	and, generally, they would follow the workflow for	11:20
19	approval.	11:20
20	Q. And is there a team that evaluates those	11:20
21	approvals?	11:20
22	A. Yes.	11:20
23	Q. And what about partners? Do they just is	11:20
24	that just the only system that exists for them, too,	11:20
25	or is there something else?	11:20

	Pa	age 67
1	MR. FALCONER: Objection. Form.	11:20
2	THE WITNESS: I'm not sure I understand.	11:21
3	BY MR. LOESER:	11:21
4	Q. Do partners just go through the developer	11:21
5	platform you just described, or is there another way	11:21
6	for them to negotiate API permissions?	11:21
7	A. So	11:21
8	MR. FALCONER: Objection. Form.	11:21
9	THE WITNESS: So they go through that	11:21
10	process.	11:21
11	BY MR. LOESER:	11:21
12	Q. So there's so there's no difference	11:21
13	between how partners access and make use of APIs and	11:21
14	the public, the public	11:21
15	A. Sorry I	11:21
16	MR. FALCONER: Objection. Form.	11:21
17	BY MR. LOESER:	11:21
18	Q. I'm just trying to understand. We will get	11:21
19	into some documents that maybe will flush this out.	11:21
20	But in terms of the different ways that APIs	11:21
21	are accessed, you have described a way that	11:21
22	developers just go on a platform. And I'm asking	11:21
23	you: Is there a different way for partners that	11:21
24	interact with Facebook?	11:21
25	MR. FALCONER: Objection. Form.	11:21

	Pa	age 68
1	THE WITNESS: So I like I think it's a	11:21
2	little broad. So I I'm struggling to know	11:21
3	exactly. But, yes, they depending on specific	11:21
4	need, they could go through a partnership	11:22
5	organization.	11:22
6	BY MR. LOESER:	11:22
7	Q. And were you involved at all in working with	11:22
8	partners and specifically with regard to the APIs	11:22
9	that they sought permission to utilize?	11:22
10	MR. FALCONER: Objection. Form.	11:22
11	THE WITNESS: Sorry. I don't understand,	11:22
12	like going through the developer platform or	11:22
13	BY MR. LOESER:	11:22
14	Q. No. Just in your role working with	11:22
15	partners, have you ever had occasion to discuss with	11:22
16	partners the permissions that they wanted for APIs?	11:22
17	A. Yes.	11:22
18	Q. Okay. And explain that process.	11:22
19	A. So I don't remember in detail because it's	11:22
20	been a long time. But they could email us about it,	11:22
21	and we would generally refer them to where they	11:22
22	needed to go.	11:22
23	Q. And do you know when Facebook first started	11:23
24	using APIs with its partners?	11:23
25	A. Sorry. Can you say that state that	11:23

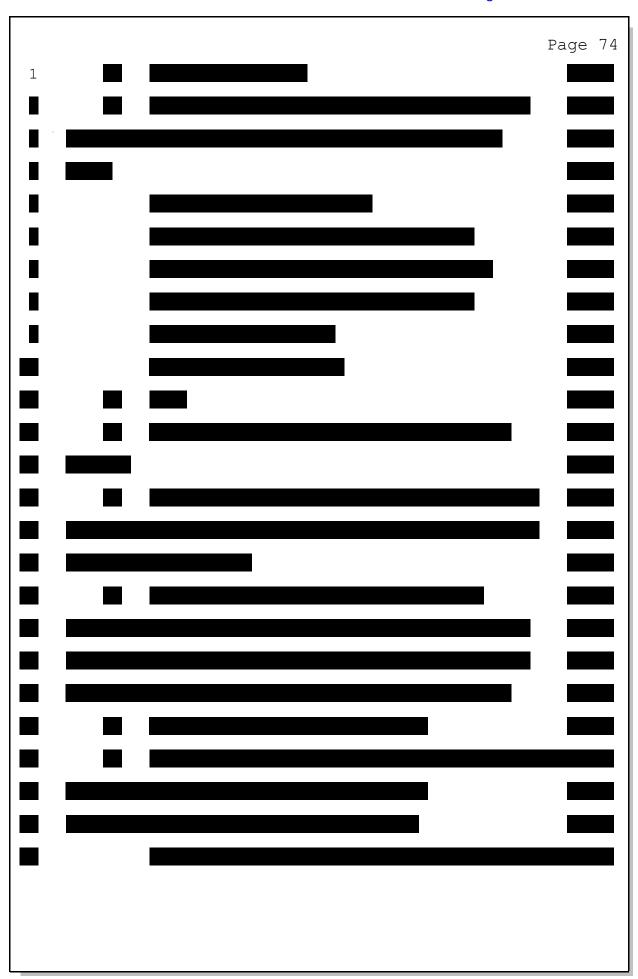
			Page 69
1	again?		11:23
2	Q.	Do you know when Facebook first started	11:23
3	using AP	PIs with its partners?	11:23
4	Α.	I'm not sure I understand that question.	11:23
5	Technica	ally, I don't know.	11:23
6	Q.	Do you know who came up with the various	11:23
7	APIs tha	t Facebook has?	11:23
8	A.	No.	11:23
9	Q.	Are you familiar with the concept of Friend	11:23
10	Sharing	on the Facebook platform?	11:23
11	Α.	I think I've heard of it, but I don't know	11:23
12	what it	is.	11:23
13	Q.	Are you aware that on the Facebook platform	11:23
14	for a pe	eriod of time, when a friend downloaded an	11:24
15	app, tha	t app could obtain access to that person's	11:24
16	friends	via Friend Sharing APIs?	11:24
17		MR. FALCONER: Objection. Form.	11:24
18		Go ahead.	11:24
19		THE WITNESS: I don't remember.	11:24
20	BY MR. I	OESER:	11:24
21	Q.	You don't remember anything about that?	11:24
22	Α.	No.	11:24
23	Q.	That's not something you were involved at	11:24
24	all in?		11:24
25	A.	I don't remember.	11:24

	Pa	age 70
1	Q. That wasn't a significant part of the work	11:24
2	that you did for Facebook?	11:24
3	A. I don't understand. Sorry, I I worked on	11:24
4	a lot of things, so I don't know the meaning of	11:24
5	that.	11:24
6	Q. But the work that you did with regard to	11:24
7	Friend Sharing in particular does not stand out for	11:24
8	you as being particularly meaningful?	11:24
9	MR. FALCONER: Objection	
10	THE WITNESS: I don't think I worked on	11:24
11	Friend Sharing.	11:24
12	BY MR. LOESER:	
13	Q. Do you know what sort of information is	11:24
14	generally made available through friends	11:25
15	permissions?	11:25
16	A. No, I don't.	11:25
17	Q. Are you aware of whether an app can obtain	11:25
18	information about a person's friends who did not	11:25
19	download the app?	11:25
20	MR. FALCONER: Objection. Form.	11:25
21	THE WITNESS: I don't know.	11:25
22	BY MR. LOESER:	11:25
23	Q. Do you know how many different friends	11:25
24	permissions APIs there are?	11:25
25	A. I don't know.	11:25

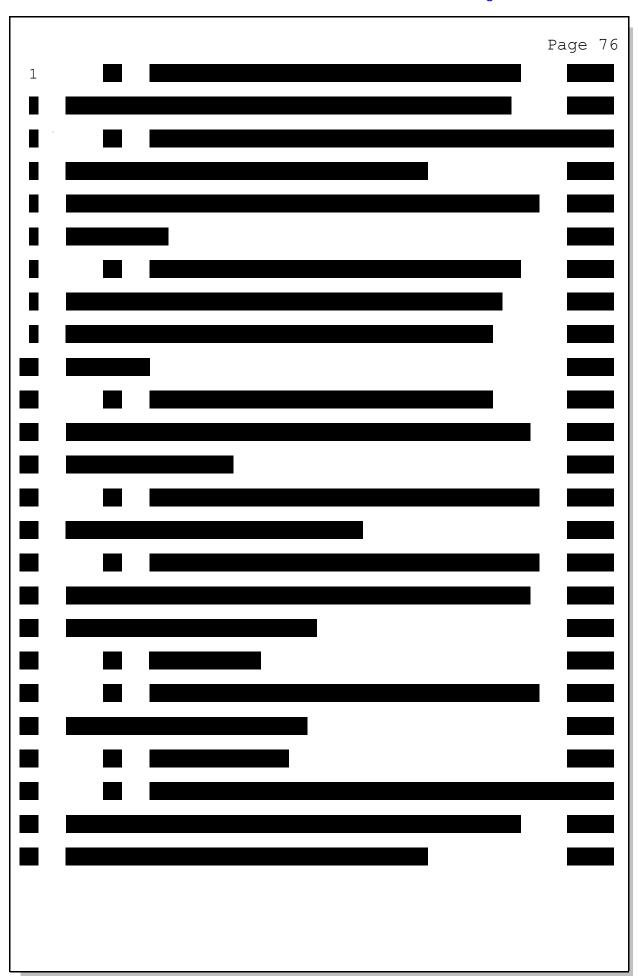
		Pε	age 71
1	Q.	Are you familiar with the term "high-signal	11:25
2	APIs"?		11:25
3	Α.	No.	11:25
4	Q.	Are you familiar with the read_stream	11:25
5	permiss	ions APIs?	11:25
6	Α.	I've heard of it.	11:25
7	Q.	Okay. What do you know about that?	11:25
8	Α.	I can't recall. It's been so long, I don't	11:25
9	know.		11:26
10	Q.	Do you know who came up with the idea of	11:26
11	friends	permissions APIs?	11:26
12	А.	No, I don't.	11:26
13	Q.	Do you know what purpose it served?	11:26
14	Α.	No.	11:26
15	Q.	Do you know if it was controversial?	11:26
16	Α.	I don't know.	11:26
17	Q.	Do you know if that was a API the friends	11:26
18	APIs we:	re often misused or abused by app developers?	11:26
19	А.	I don't know.	11:26
20		MR. LOESER: I will show you Exhibit what	11:26
21	we mark	ed as Exhibit 4.	11:26
22		(Exhibit 4 marked for identification.)	11:26
23	BY MR.	LOESER:	11:26
24	Q.	We will share that as well.	11:26
25		Exhibit 4 is an email from Marie Hagman to	11:26

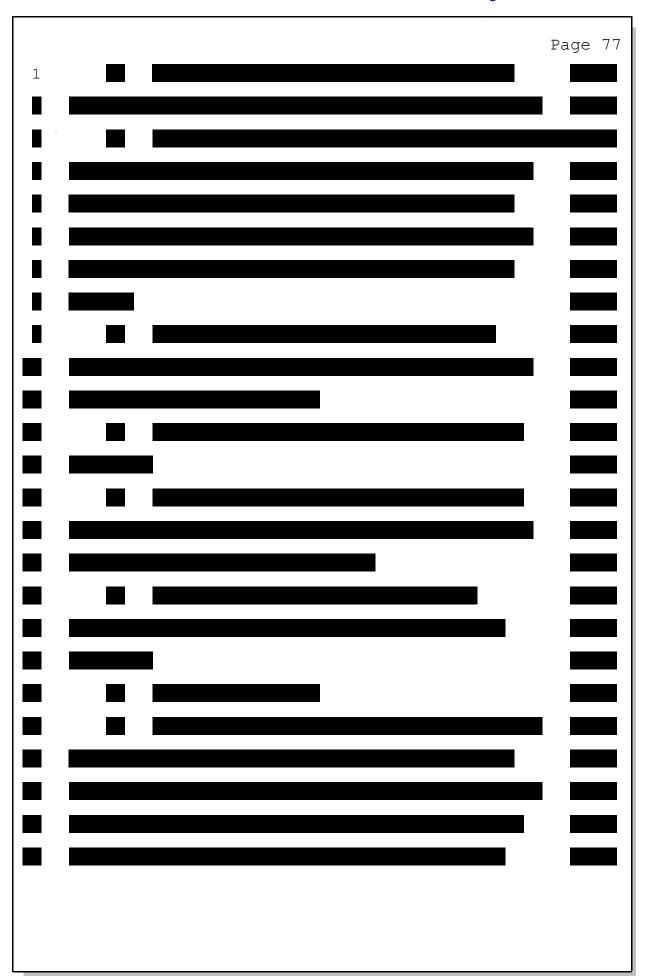
		Page 72
1	Chris Daniels, with a cc to you, dated May 3rd,	11:27
2		
3	Do you see that, Miss Chang?	11:27
4	A. Yes. May I read it?	11:27
5	Q. Yes, of course. I'm going to ask you some	11:27
6	specific questions about different parts of the	11:27
7	email string, but so we will go through it, but	11:27
8	if you want to take a look at it, go ahead.	11:27
9	A. Okay.	11:27
10		
14	Q. Okay. And if this email was cc'd to you,	11:28
15	does that mean that you received the email?	11:28
16	A. Yes.	11:28
17	Q. As we go through a lot of these emails, if	11:28
18	you are on the email as a recipient, you don't have	11:28
19	any reason to believe you didn't receive the emails;	: 11:28
20	right?	11:28
21	A. Sorry. I didn't what?	11:28
22	Q. If you're on an email as a recipient we	11:28
23	are going to go through a number of emails there	11:28
24	is no reason for you to believe that you did not	11:28
25	actually receive the email; correct?	11:28
Ì		

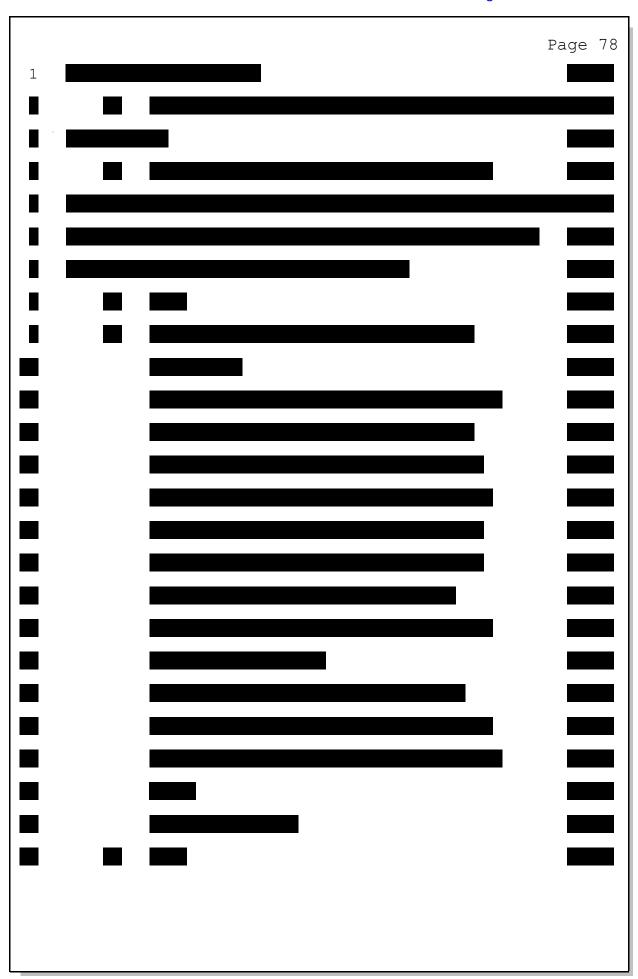
			Page 73
1	Α.	I don't think so.	11:28
2			
12	Q.	Okay. When you say a "permission," that	11:29
13	means pe	ermission to access and use an API; is that	11:29
14	right?		11:29
15	Α.	Again, I don't know the technical specifics	s. 11:29
16	Q.	Can you use an API if you don't have	11:29
17	permiss	ion to use the API?	11:29
18	Α.	I don't know.	11:29
19	Q.	You don't have any understanding of what	11:29
20	"permiss	sions" means in connection with an API?	11:29
21	А.	I don't think I understand in how the	11:29
22	context	you're referring it to.	11:29
23			



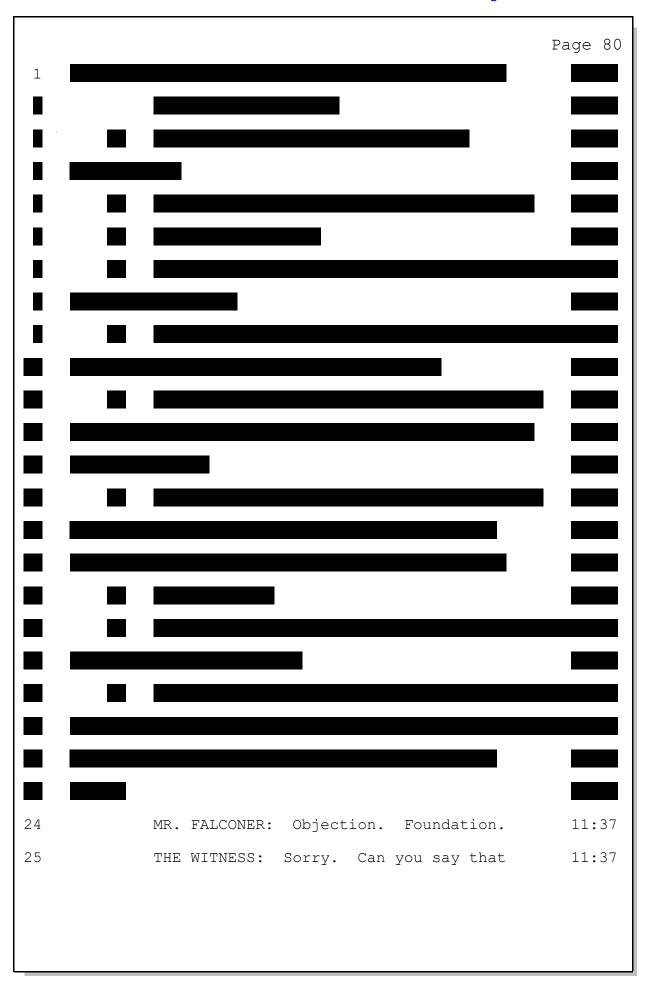
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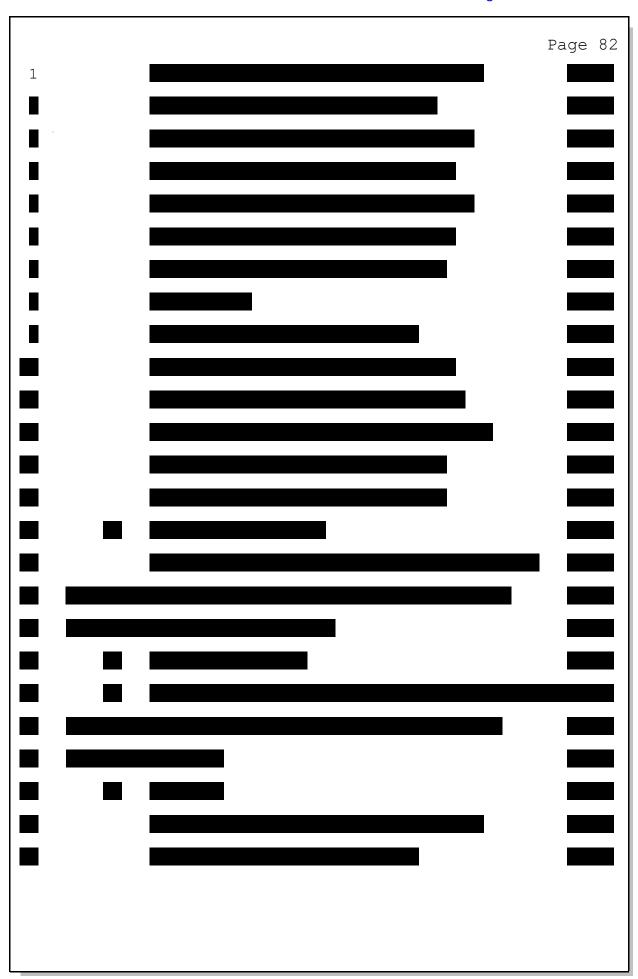


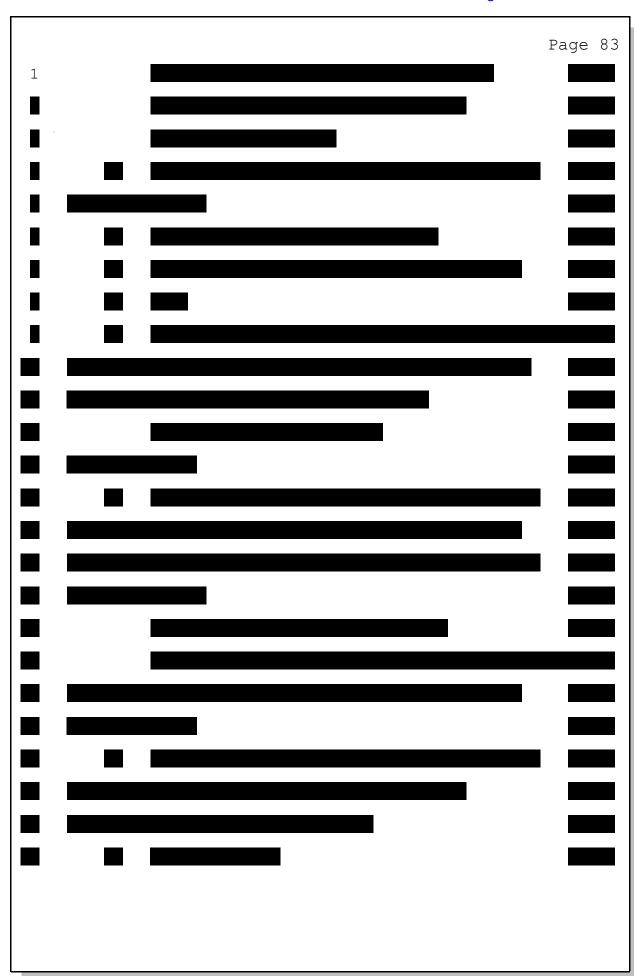


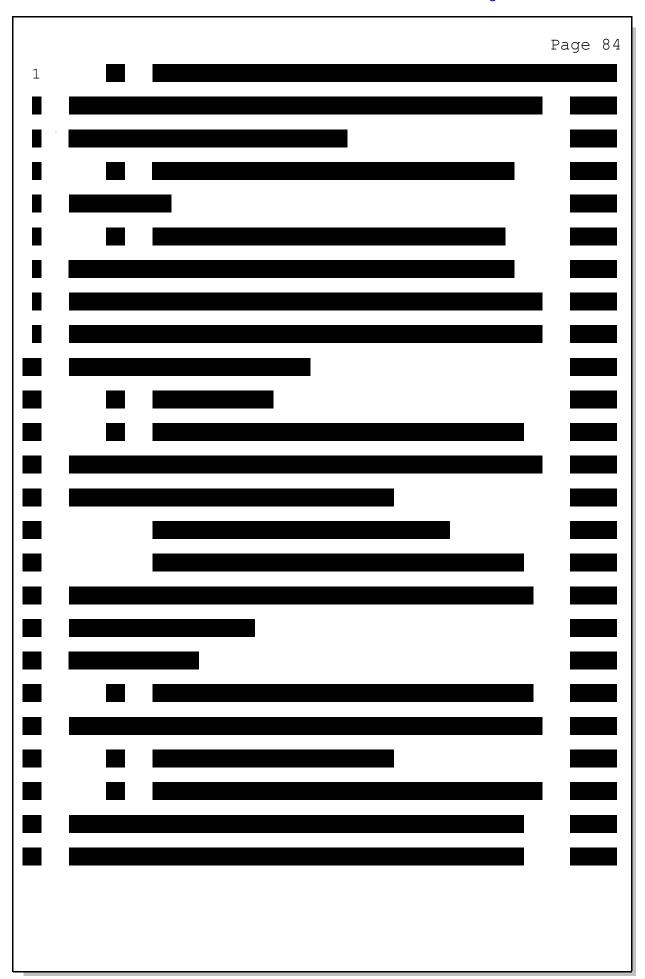
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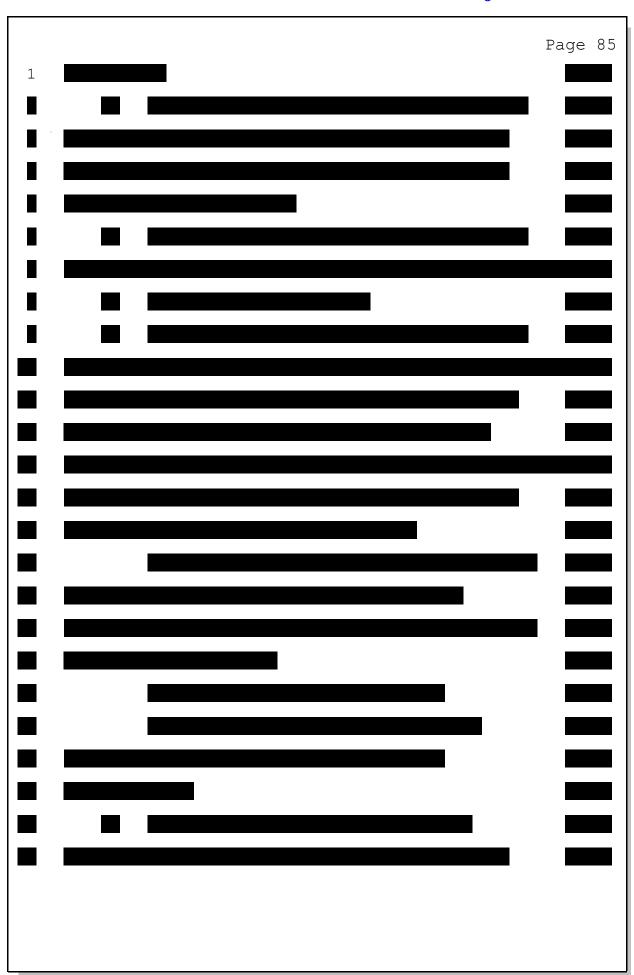


		7
		Page 81
1	again?	11:38
2	BY MR. LOESER:	11:38
3		







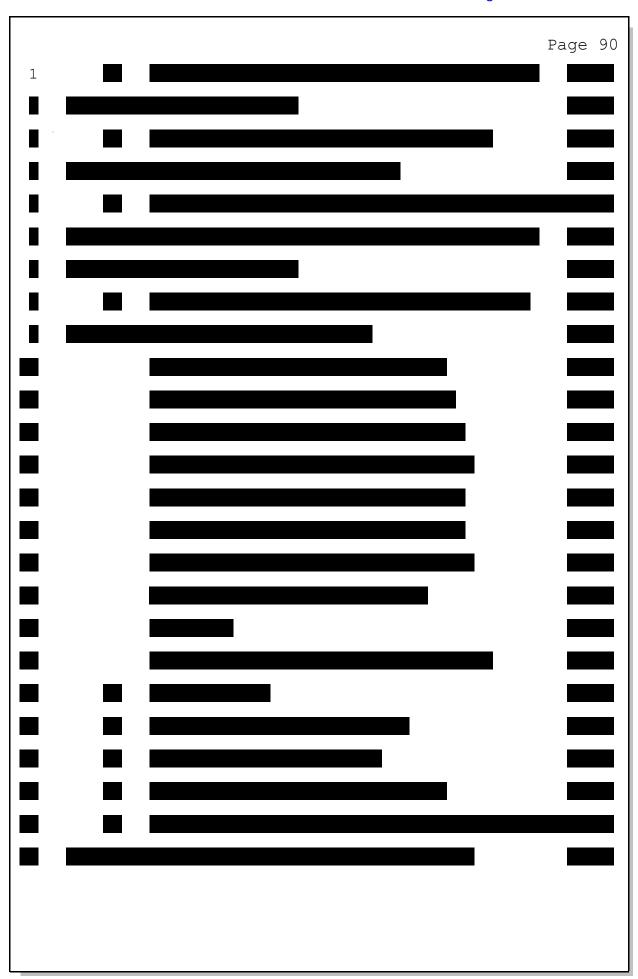


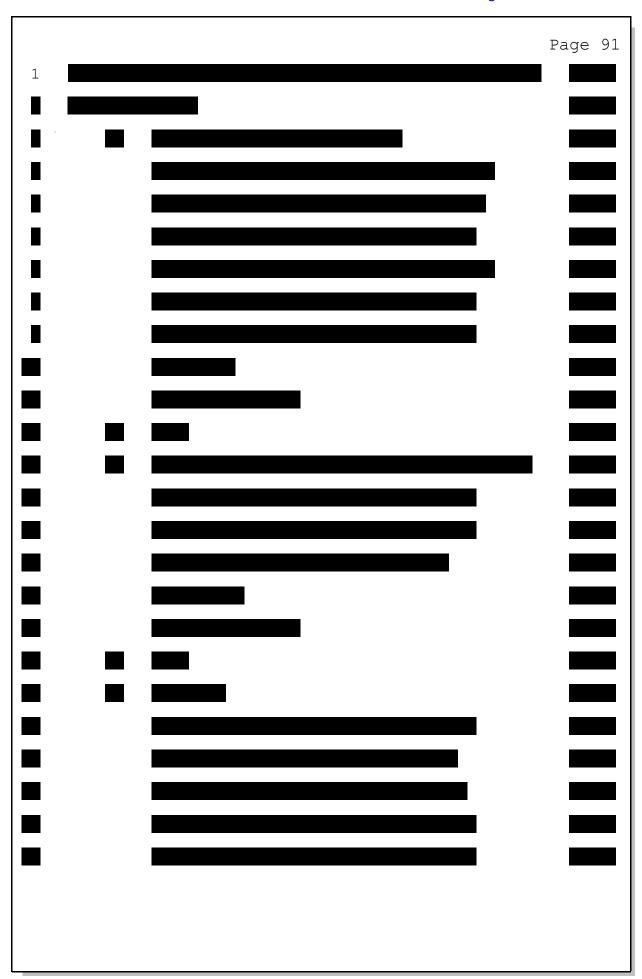
		Page 86
1		
7	MR. LOESER: Okay. We can go to the next	11:43
8	exhibit, which should be tab 5.	11:44
9	Actually, if we can go off the record for	11:44
10	one second. Give us three minutes.	11:44
11	THE VIDEOGRAPHER: Okay. Going off the	11:44
12	record. The time is 11:44.	11:44
13	(Off the record.)	11:44
14	THE VIDEOGRAPHER: We are back on the	11:48
15	record. The time is 11:48.	11:48
16	(Exhibit 5 marked for identification.)	11:48
17	BY MR. LOESER:	11:48
18	Q. Miss Chang, we are showing you what's now	11:48
19	been marked Exhibit 5, which we will screen share as	s 11:48
20	well, which is an email from Constantin, and I'm	11:48
21	sure I will get this last name wrong, but	11:49
22	Koumouzelis. Is that how you say that?	11:49
23	A. Sorry. I'm also trying to update the	11:49
24	Egnyte. I can't even say his last name. I call him	n 11:49
25	"KP."	11:49

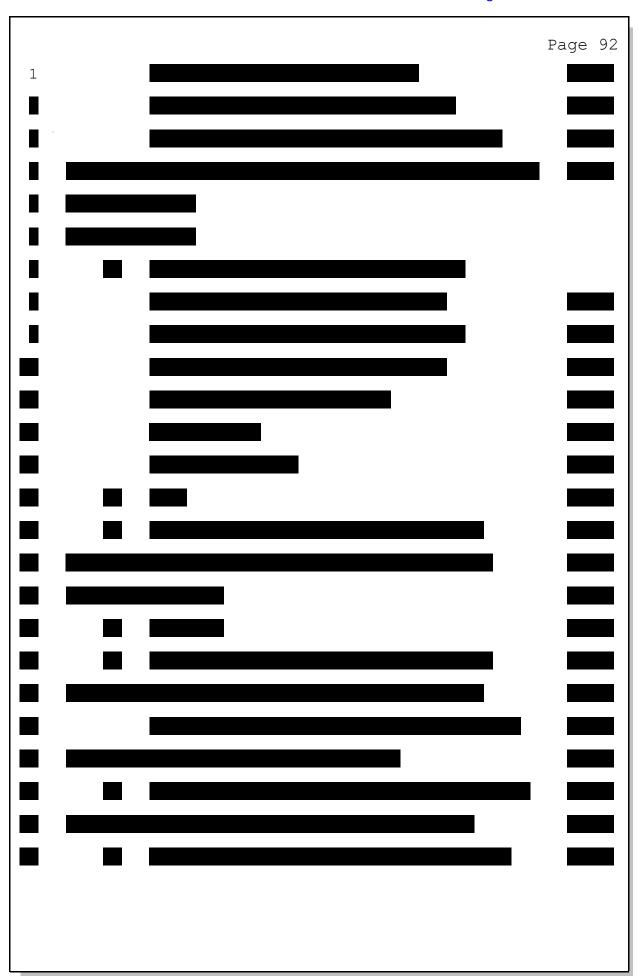
		Page 87
1	Q. Okay. So an email from KP to Visha Gupt	ta 11:49
2	A. Oh, sorry. Wrong person. Not the same	11:49
3	person.	11:49
4	Q. How do you say this person's last name?	11:49
5	A. I don't know how to say his last name.	11:49
6	Q. Call him "CK." How about that?	11:49
7	A. Okay.	11:49
8	Q. And it is an email sent Friday, August 1	l6th, 11:49
9	and it goes to a number of people.	11:49
10	Visha Gupta, do you know who that is?	11:49
11	A. I think I know. I think I could see his	s 11:49
12	face, but I don't know well.	11:49
13	Q. Okay. And it also went to Douglas Purdy	y. 11:49
14	Do you know who that is; right?	11:49
15	A. Yes.	11:49
16	Q. And his job was what?	11:49
17	A. Director of Platform Product, I think.	11:49
18	Q. And there are several other people that	11:50
19	received this email, and you're familiar with who	11:50
20	these people are; right?	11:50
21	A. Yes, I know who they are.	11:50
22	Q. And these are people that you worked wit	th 11:50
23	regularly at the time?	11:50
24	A. Not necessarily regularly. I probably	know 11:50
25	them more via emails.	11:50

		P	age 88
1	Q.	Who is Eddie O'Neil?	11:50
2	Α.	I believe in 2013, he was a product manager.	11:50
3			
13	_	MR. LOESER: Okay. Well, why don't we look	11:50
14	at the a	attachment. Maybe that will refresh your	11:51
15	recollec	ction.	11:51
16		We will mark Exhibit 6.	11:51
17		(Exhibit 6 marked for identification.)	11:51
18		THE WITNESS: Sorry. Am I supposed to open	11:51
19	it?		11:51
20	BY MR. I	LOESER:	
21	Q.	Yes. We can go to Exhibit 6.	11:51
22	Α.	I don't see anything.	11:51
23	Q.	It takes a minute. It's traveling through	11:51
24	space.		11:51
25	Α.	Oh, okay.	11:51

		Pa	age 89
1	Q.	If you can take a minute to familiarize	11:51
2	yourself	with the document.	11:51
3	Α.	Yes, may I have a minute? Thank you.	11:51
4	Q.	So I will have a couple of questions about a	11:53
5	few parag	graphs of this. So when you have had enough	11:53
6	time to	familiarize yourself with the document	11:53
7	Α.	Do I need to read the whole thing or	11:53
8	Q.	No.	11:53
9	Α.	Okay. Okay.	11:53
10			



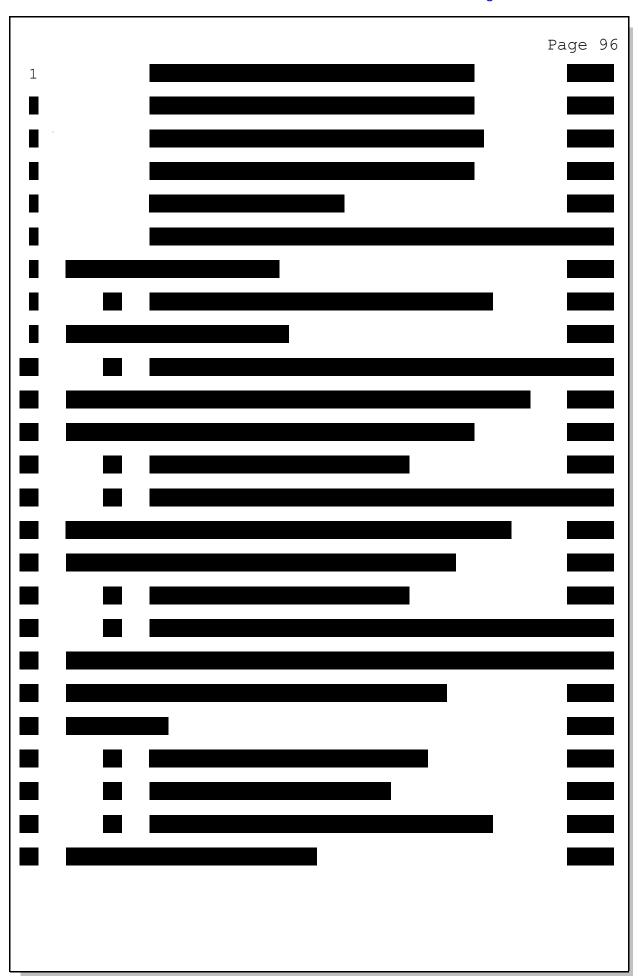




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1			
7	Α.	Sorry, where is that one?	11:57
8	Q.	It's on screen share, as well, if that's	11:57
9	easier.		11:57
10		Okay. Oh, sorry. Yes.	11 : 57
11			

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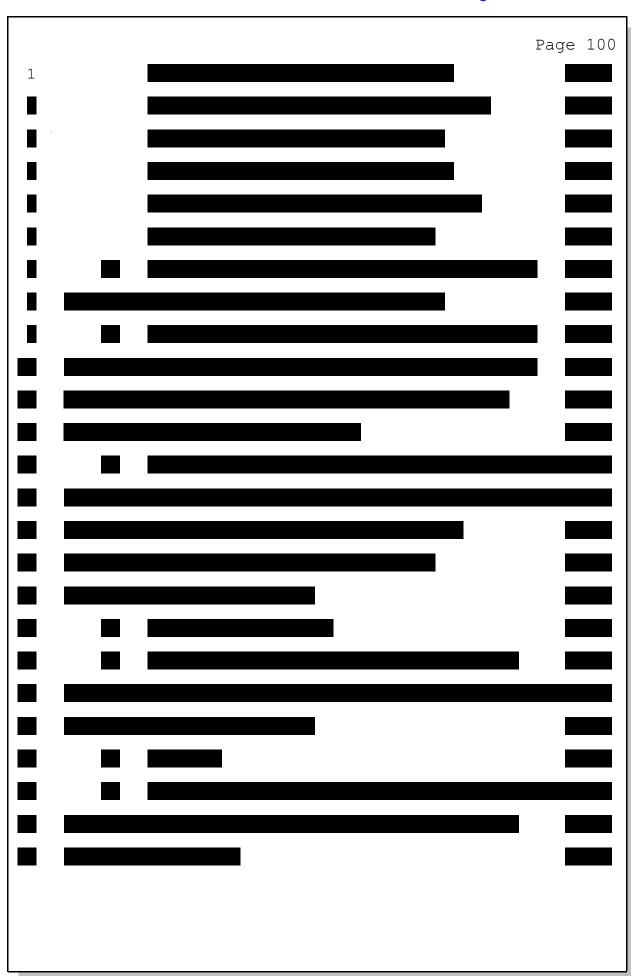
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	Page 95
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		F	age 97
1			
7	Q.	You have no recollection of that whatsoever?	
8	Α.	No.	12:02
9	Q.	Do you remember what your job was in 2013?	
10	Α.	I believe it was a partner manager.	12:02
11		MR. LOESER: I will move to Exhibit 7.	12:02
12		(Exhibit 7 marked for identification.)	12:02
13	BY MR. I	LOESER:	12:02
14	Q.	It will show up shortly and we will screen	12:02
15	share th	ne exhibit as well. It's thinking. You will	12:02
16	get it.	We're waiting for the document to load.	12:02
17		Okay. Do you have it? Can you see the	12:03
18	document	? There we go.	12:04
19		All right. I'm showing you Exhibit 7, which	12:04
20	is an en	mail from KP. We can agree to call this	12:04
21	person '	'KP"; right?	12:04
22	Α.	Yes.	12:04
23	Q.	You know who I'm talking to when I say "KP"?	2 12:04
24	Α.	Yes.	12:04
25	Q.	Okay. And it's an email to Ime Archibong	12:04

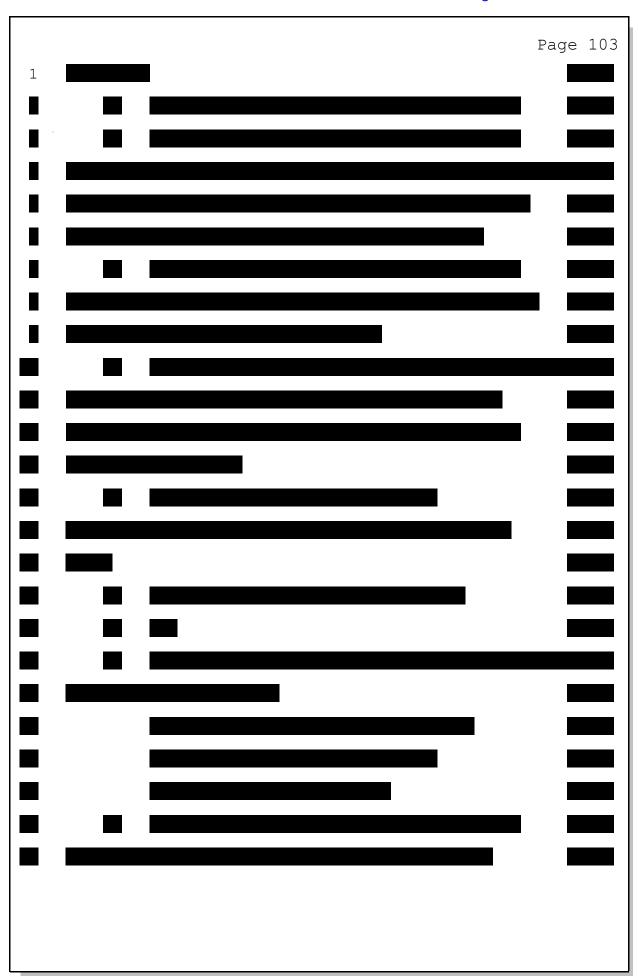
1		Page 98
1	and yourself; is that right?	12:04
2	A. Yes.	12:04
3		
L9	Q. Okay. Do you want to take	12:05
20	MR. FALCONER: My apologies. My mic was	12:05
21	muted. I had a form objection to that last	12:05
22	question. Sorry. I was late on that.	12:05
23	BY MR. LOESER:	12:05
	Q. I'm going to ask you some questions about	
24	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
24 25	this email string, and I can just jump right in or	12:05

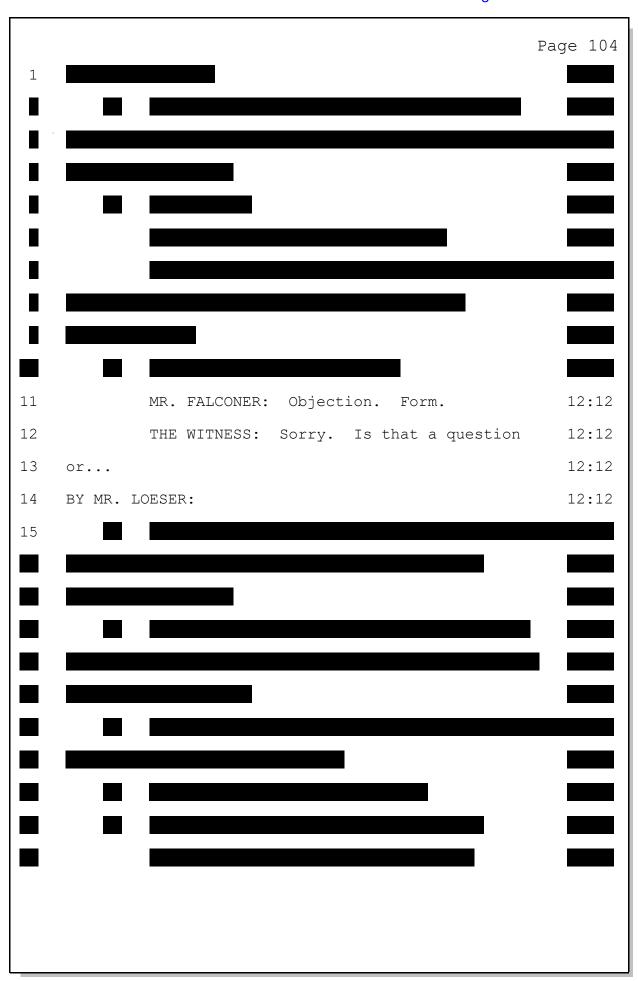
		age 99
1	if you want to flip through the document first,	12:05
2	that's fine too.	12:05
3	A. Yes. If I can have one minute to look, that	12:05
4	would be great. Thank you.	12:05
5	Yes, okay.	12:06
6	Q. Okay. Why don't we go to the beginning of	12:06
7	the email string, so if you flip through to the end	12:06
8	of this document, on the second-to-the-last page,	12:06
9	there's an email from Ime Archibong to you, dated	12:06
10	August 21st, 2013. Do you see that?	12:06
11	A. Yes.	12:06
12	Q. And it has the same subject line we read	12:06
13	before?	12:06
14	A. Yes.	12:06
15	Q. And that email forwards a string forwards	12:06
16	an email that you sent down in the paragraph below	12:07
17	it. Do you see that? You sent it at 2:30 a.m.	12:07
18	A. Yes.	12:07
19		
1		

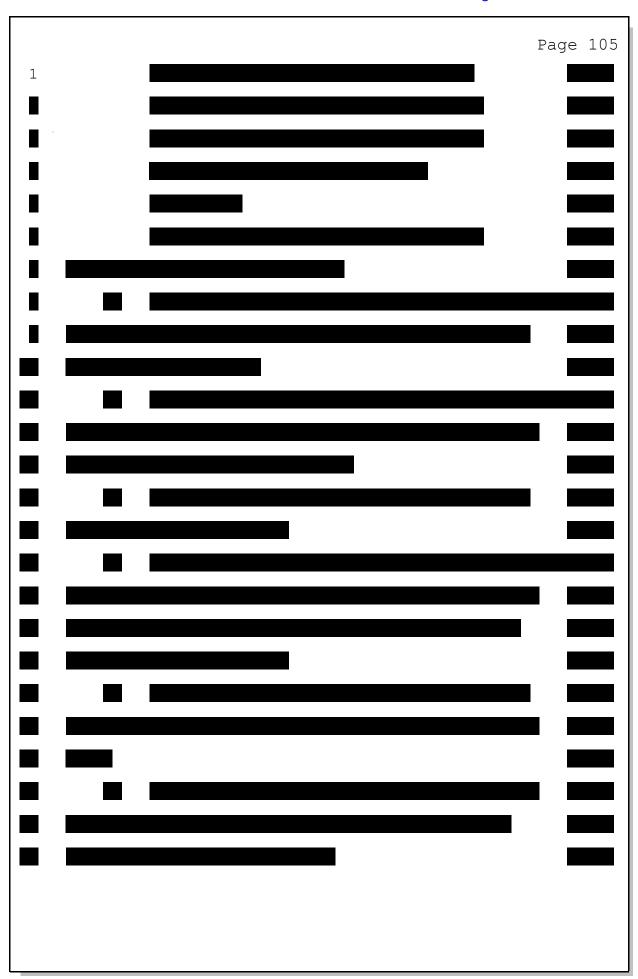


	Pa	age 101
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10	DEPOSITION REPORTER: Excuse me. There was	12:09
11	an interruption in the audio. Can you repeat your	
12	question, please, Counsel.	12:09
13	BY MR. LOESER:	12:09
14		
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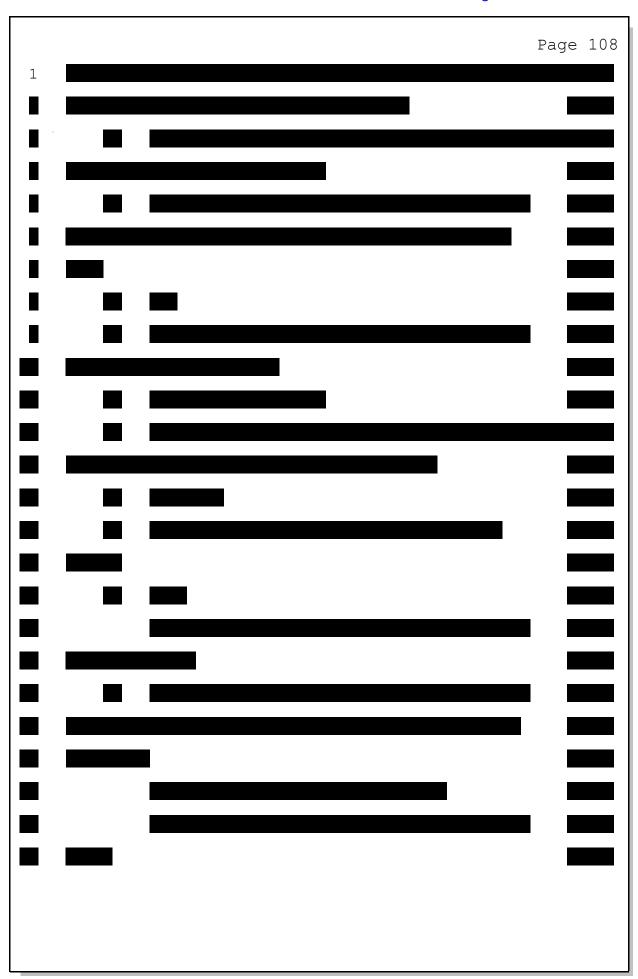






	Pa	ge 106
1	MR. FALCONER: Objection. Asked and	12:14
2	answered.	12:14
3	THE WITNESS: Sorry. What was the question	12:14
4	again?	12:14
5	BY MR. LOESER:	12:14
6		
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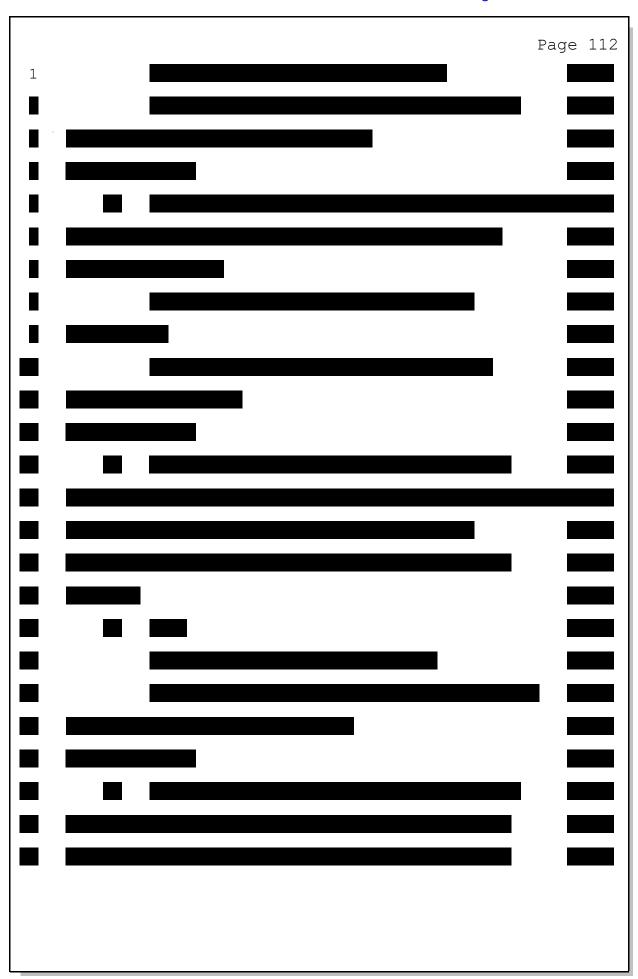
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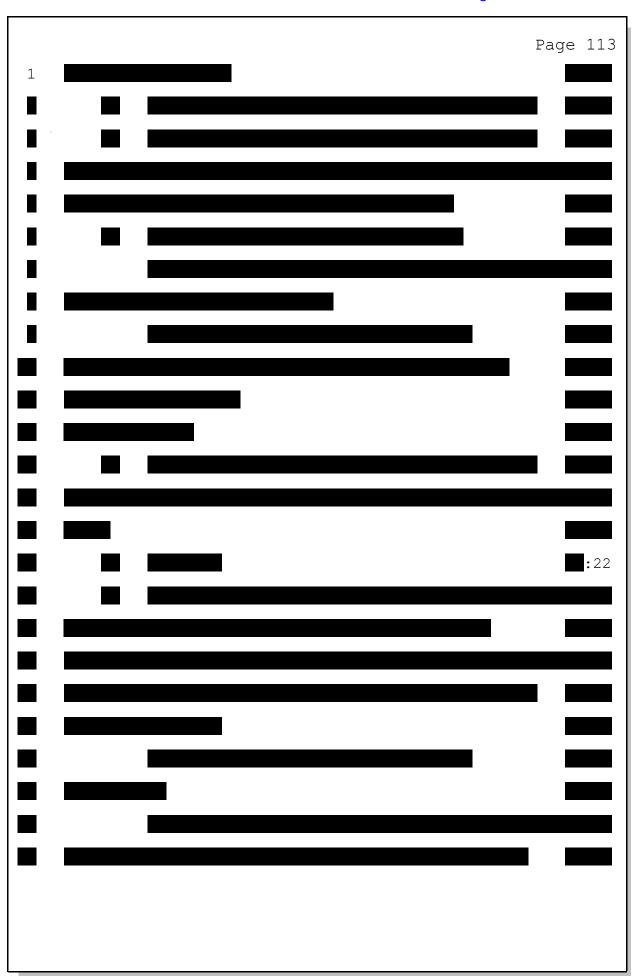


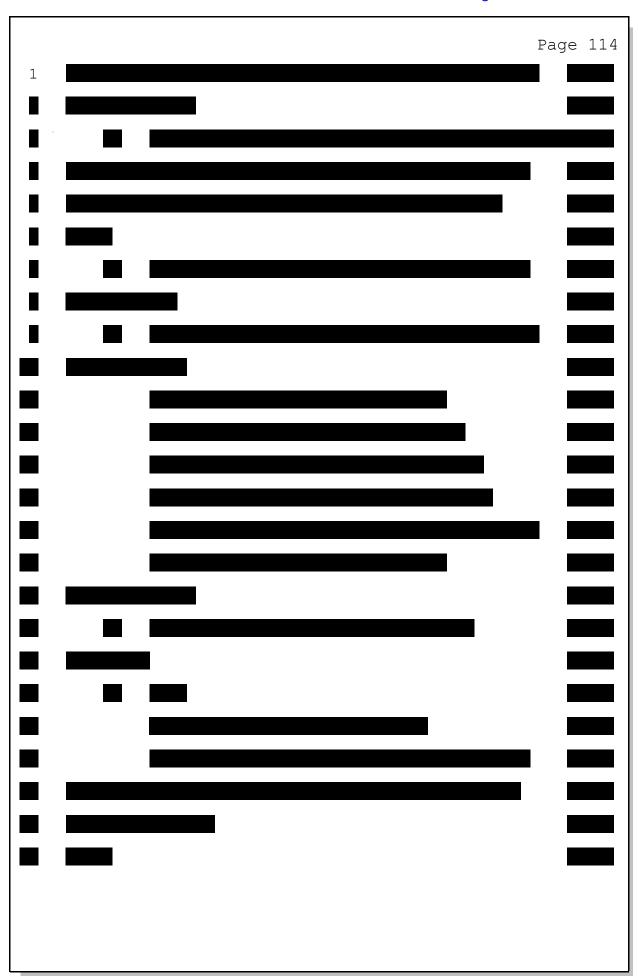
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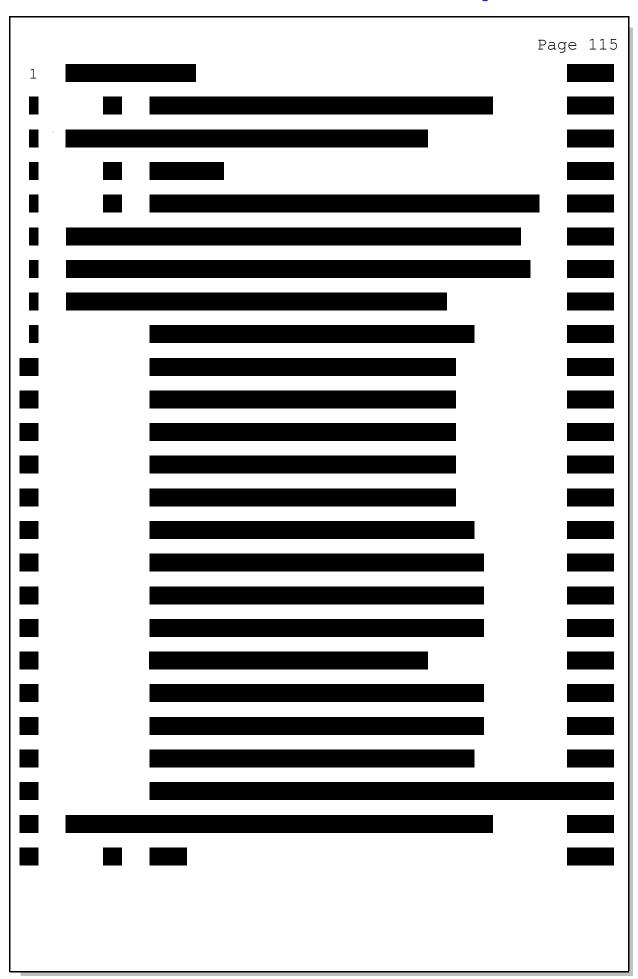
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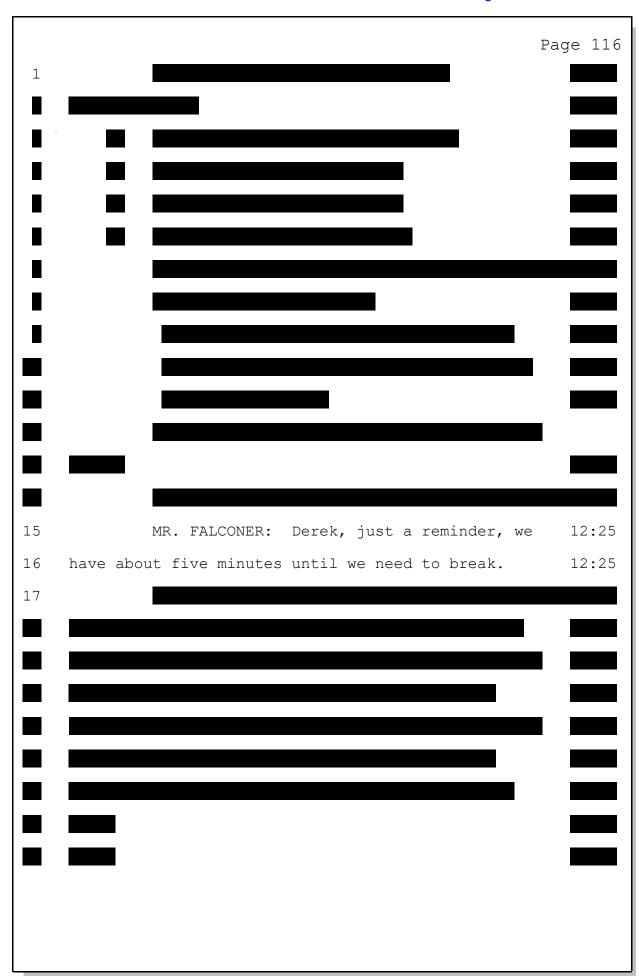
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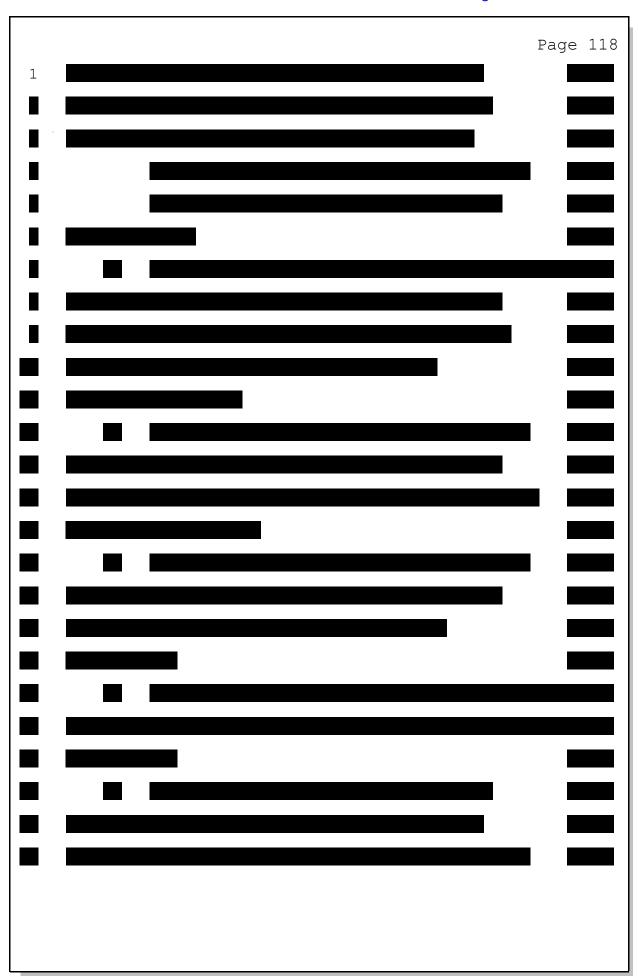








	Pag	ge 117
1		
6	MR. LOESER: Okay. We can move on from that	12:26
7	exhibit.	12:26
8	BY MR. LOESER:	12:26
9	Q. Now, Miss Chang, you are aware that Graph	12:26
10	API version 1 was replaced with Graph API version 2;	12:27
11	right?	12:27
12	A. I don't know specifically.	12:27
13		



	Pa	ge 119
1		
4	A. I don't remember.	12:29
5	Q. Did you receive annual performance reviews?	12:29
6	A. In what year?	12:29
7	Q. In any year.	12:29
8	A. I received a performance review.	12:29
9	Q. And in connection with your performance	12:29
10	review, were you required to describe what you did	12:29
11	during the year that was being reviewed?	12:29
12	A. I believe so, yes.	12:29
13	Q. And in those performance reviews, were you	12:29
14	careful to make sure that you described all of the	12:29
15	important, or at least the most important things,	12:29
16	you worked on?	12:29
17	A. At that time, yes.	12:29
18		
24	Q. Okay. Would that be generally an accurate	12:30
25	statement, though, that the tasks that you performed	12:30

	Pac	ge 120
1	that were important were likely the tasks that were	12:30
2	discussed in your review?	12:30
3	A. I'm not sure. I don't know.	12:30
4	Q. What's the documentation that's created for	12:30
5	performance reviews?	12:30
6	A. I'm not sure I understand.	12:30
7	Q. Do you fill something out to describe the	12:30
8	work you've done?	12:30
9	A. So we have a tool, a performance tool, but I	12:30
10	don't know if that was I don't remember if that	12:30
11	was there that year.	12:30
12	Q. Do you recall well, what years do you	12:30
13	recall that being there?	12:30
14	A. I don't know I don't know specifically	12:30
15	what year, but it's I mean, I know it exists, but	12:30
16	I don't remember what year exactly it started.	12:30
17	Q. Do you recall that you generally were	12:30
18	reviewed every year?	12:31
19	A. I don't I don't think so.	12:31
20	Q. Okay. And do you recall any paperwork	12:31
21	whatsoever being handed to you in connection with	12:31
22	your performance reviews?	12:31
23	A. Paperwork or	12:31
24	Q. Did you fill anything out at all? Did you	12:31
25	write anything down to describe the work you did	12:31

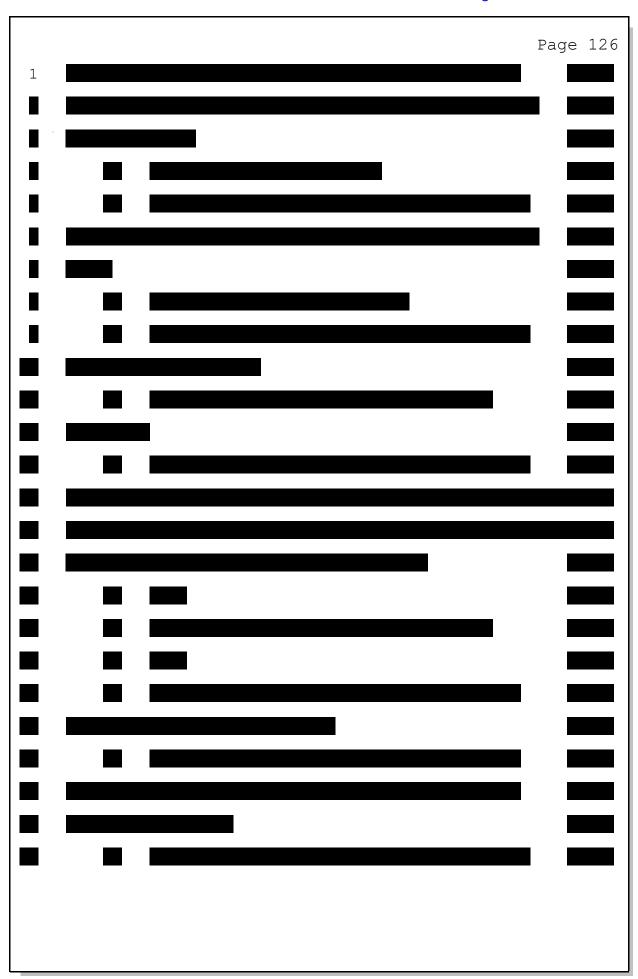
	Pa	ge 121
1	that was being reviewed?	12:31
2	A. So, again, I think it depends on what year,	12:31
3	but there is a tool. We fill it out, so I don't	12:31
4	I guess if you can be more specific.	12:31
5	Q. When you're being reviewed, do the people	12:31
6	you report to write something about you?	12:31
7	A. Generally?	12:31
8	Q. Generally.	12:31
9	A. Yes.	12:31
10	MR. LOESER: Counsel, I don't think we have	12:31
11	received any performance reviews from Miss Chang,	12:31
12	and to the extent any of them discuss any of the	12:31
13	topics related to this case, we would ask to make	12:31
14	sure that those are produced.	12:32
15	MR. FALCONER: Great. And we have just hit	12:32
16	12:30, so let's go ahead and take our lunch break.	12:32
17	It's going to be an hour, so we'll be back at 1:30.	12:32
18	Maybe 1:35, but somewhere in there.	12:32
19	MR. LOESER: Okay. Can we get a count on	12:32
20	time remaining?	12:32
21	THE VIDEOGRAPHER: Sure. Would you like me	12 : 32
22	to do that once we go off the record or right now?	12:32
23	MR. LOESER: Yeah, that's fine.	12:32
24	THE VIDEOGRAPHER: Okay. This marks the end	12:32
25	of media No. 2 in the deposition of Jackie Chang.	12 : 32

		.ge 122
1	Off the record. The time is 12:32.	12:32
2	(Lunch recess.)	12:32
3	THE VIDEOGRAPHER: This marks the beginning	13:35
4	of media No. 3 in the deposition of Jackie Chang.	13:35
5	We are back on the record. The time is 1:35.	13:35
6	BY MR. LOESER:	13:35
7	Q. Good afternoon, Miss Chang. When we left	13:35
8	off, we were talking about Exhibit 7. And as we	13:35
9	saw, there was an attachment indicated in that	13:35
10		
12	Do you recall our discussion of that?	13:35
13	A. Sorry. I'm just opening it up. Yes.	13:36
14	MR. LOESER: I would like to introduce as	13:36
15	Exhibit 8 the actual attachment, which we will	13:36
16	introduce as the native file Excel spreadsheet. And	13:36
17	then I will screen share and we can look through	13:36
18	some folders. This might take two hours to upload.	13:36
19	(Exhibit 8 marked for identification.)	13:36
20	MR. LOESER: Oh, look. It's already there.	13:36
21	BY MR. LOESER:	13:36
22		

		I	Page 123
1			
2	Excel?		13:37
3	Α.	Yes, the service, yeah.	13:37
4	Q.	And is that something do you use Excel	13:37
5	regularl	y?	13:37
6	Α.	I guess. Not lately, but yeah.	13:37
7	Q.	Do you know how to navigate your way around	d 13:37
8	an Excel	file?	13:37
9	А.	Yes.	13:37
10			

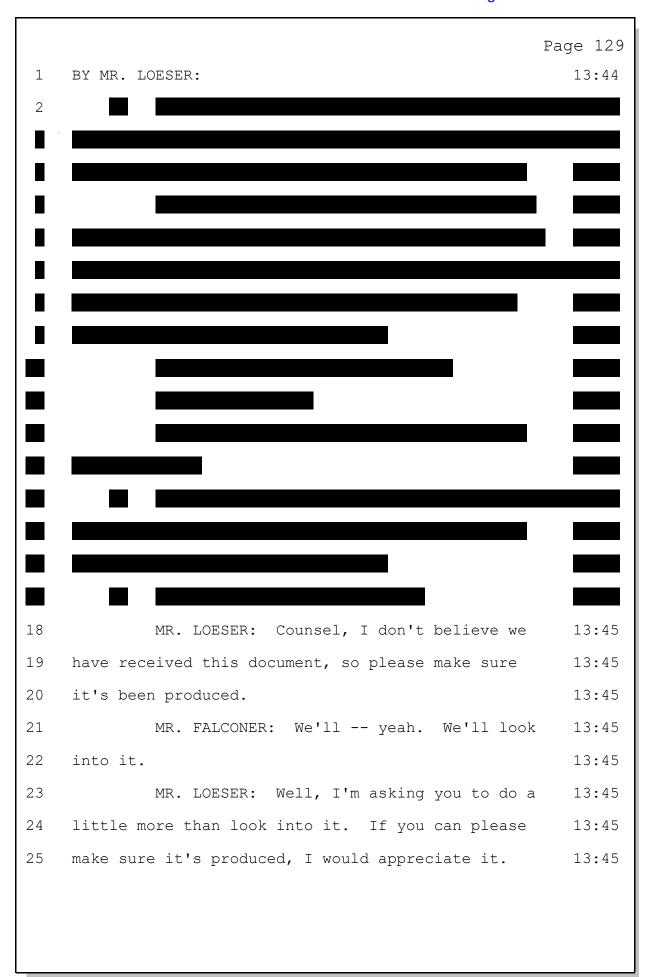
	Pac	ge 124
17	have access to this fully or	13:39
18	Q. No. Unfortunately, we are just screen	13:39
19	sharing.	13:39
20	A. Oh, okay. Got it.	13:39
21	MR. FALCONER: It is in the Exhibit Share if	13:39
22	you want to look at it.	13:39
23	THE WITNESS: Okay. Got it. I am going to	13:39
24	open it. Okay.	13:39
25	Sorry, can you repeat your question?	13:39

	Pa	ge 125
1	BY MR. LOESER:	
2		
8	Q. Did you work with partners that were mobile	13:39
9	apps?	13:39
10	A. I worked with partners that may have had a	13:39
11	mobile app, but I did not work holistically on	13:39
12	mobile apps.	13:39
13	Q. Okay. And over the long time that you have	13:40
14	been working with partners, I gather that there were	13:40
15	lots of different types of partners that you worked	13:40
16	with that may have had a number of these different	13:40
17	types of apps. Is that fair to say?	13:40
18	A. Sorry. I don't understand that. You mean	13:40
19	that fall into different categories or	13:40
20	Q. Yeah. You work maybe with some mobile apps	13:40
21	and some game apps. You work with partners that had	13:40
22	these different types of apps; right?	13:40
23	A. No. I don't know where I could classify	13:40
24	that with specificity.	13:40
25		



	P	age 127
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21	MR. LOESER: Okay. We can leave this	13:44
22	document, as fascinating as it is.	13:44
23	If we can go back to Exhibit 7, which is	13:44
24	your August 21st, 2013 email.	13:44
25	/ / /	13:44



	Paq	ge 130
1	MR. FALCONER: Yeah. I mean, I'm not going	13:46
2	to make that commitment to you, but like I said,	13:46
3	I'll look into it.	13:46
4	BY MR. LOESER:	13:46
5		
15	Q. Is it your practice to send email that	13:46
16	includes false information?	13:46
17	A. I I don't know. I don't really	13:46
18	understand that question.	13:46
19	Q. Is it your general practice when you're	13:46
20	communicating with your colleagues to send them an	13:46
21	email that contains false information?	13:46
22	A. I I don't know. I I usually don't	13 : 47
23	have that intention.	13 : 47
24	Q. And so when you wrote this email, is it fair	13 : 47
25	to assume that you were endeavoring to communicate	13 : 47

	Pa	ıge 131
1	accurate information?	13:47
2	MR. FALCONER: Objection. Form.	13:47
3	THE WITNESS: So, again, I don't like I	13:47
4	don't remember this. I don't want to assume like	13:47
5	yeah, I don't want to assume anything.	13:47
6	BY MR. LOESER:	13:47
7	Q. I'm not asking you if you remember this	13:47
8	email. I'm asking you if you sent this email;	13:47
9	right?	13:47
10	A. That's what it says.	13:47
11	Q. And it was your general practice when	13:47
12	sending email to communicate accurate information;	13:47
13	right?	13:47
14	A. Yes.	13:47
15	Q. And it was not your general practice to	13:47
16	communicate information that you knew to be false;	13:47
17	right?	13:47
18	A. Again, I feel like that's I don't know.	13:47
19	Like I don't know what the information is, so my	13:47
20	intent generally is not I don't know the	13:47
21	information itself.	13:48
22	Q. Right. I'm not asking you if the	13:48
23	information is or isn't false. I'm asking you if it	13:48
24	is your intent to generally communicate accurate	13:48
25	information in your	13:48

	Pag	ge 132
1	A. It is my intent to, yes, provide	13:48
2	information.	13:48
3	Q. And you testified you couldn't recall most	13:48
4	of what we talked about with regard to this email.	13:48
5	Is there something else that you can think	13:48
6	of that would refresh your recollection regarding	13:48
7	the events discussed in this email?	13:48
8	A. Not that I know of.	13:48
9	Q. And so would you agree that this email is	13:48
10	the best evidence, that you're aware of, of what you	13:48
11	knew and were thinking at the time regarding these	13:48
12	topics?	13:48
13	MR. FALCONER: Objection. Form and	13:48
14	foundation.	13:48
15	THE WITNESS: So, again, I can't make that	13:48
16	assumption.	13:48
17	BY MR. LOESER:	13:48
18	Q. You can't make the assumption that this	13:48
19	email is the best evidence of what you were thinking	13:48
20	at the time you wrote the email?	13:48
21	A. Correct. I don't know.	13:49
22	Q. But you can't remember you can't identify	13:49
23	anything else that would be a more accurate	13:49
24	reflection of what you were thinking at the time you	13:49
25	wrote this email?	13:49

	Pag	ge 133
1	A. Correct. I don't I don't know, so I	13:49
2	don't know what the expanse is.	13:49
3	Q. Is it fair to say that if this email doesn't	13:49
4	refresh your recollection of the events at the time,	13:49
5	you're not aware of anything else that would?	13:49
6	A. I don't I don't know.	13:49
7	Q. You don't know if there is any other	13:49
8	evidence that would refresh your recollection?	13:49
9	A. That question would assume I would know,	13:49
10	which I don't know.	13:49
11	Q. But I'm asking you, do you know of any other	13:49
12	evidence that would refresh your recollection?	13:49
13	A. I don't know.	13:49
14	Q. You don't know if there is any other	13:49
15	evidence that would refresh your recollection?	13:49
16	A. Again, I don't know what I don't know, so I	13:49
17	can't make that assumption that I would know.	13:49
18	Q. And if there were something else that might	13:50
19	refresh your recollection, what might that be?	13:50
20	MR. FALCONER: Objection. Asked and	13:50
21	answered. Lack of foundation.	13:50
22	BY MR. LOESER:	13:50
23	Q. You didn't there's not like a recorded	13:50
24	transcripts of communications that you had, as far	13:50
25	as you know, is there?	13:50

	Pa	ge 134
1	A. I don't to my knowledge, I don't think	13:50
2	so.	13:50
3	Q. Is it fair to say that if someone wanted to	13:50
4	figure out what you were thinking about these topics	13:50
5	at the time of this email, this email would be a	13:50
6	good guide for what you were thinking?	13:50
7	MR. FALCONER: Objection. Form and	13:50
8	foundation.	13:50
9	THE WITNESS: Again, I can't speculate on	13:50
10	that.	13:50
11	BY MR. LOESER:	13:50
12	Q. I'm not asking you to speculate on anything.	13:50
13	I'm just asking you if you think this email would be	13:50
14	a good guide of what you were thinking about the	13:50
15	topics discussed in the email	13:50
16	A. Well, that would require me to speculate.	13:51
17	Q. What would it require you to speculate at?	13:51
18	A. You're asking me if I know if this is the	13:51
19	best, which would assume I know what everything is	13:51
20	and I don't know what everything is, so I don't	13:51
21	know. So I can't make that assumption.	13:51
22	Q. Let me be specific. Would you agree that	13:51
23	this email is a good guide of what you were thinking	13:51
24	about the topics discussed in the email at the time	13:51
25	you sent the email?	13:51

	Pag	ge 135
1	MR. FALCONER: Objection. Form. Foundation	13:51
2	and asked and answered.	13:51
3	THE WITNESS: Again, when you say "good," I	13:51
4	don't know where I could like where I could say I	13:51
5	know what a definition of good means.	13:51
6	BY MR. LOESER:	13:51
7	Q. I will try one more time. Would you agree	13:51
8	that the email that you wrote is evidence of what	13:51
9	you were thinking about the subjects discussed in	13:51
10	your email at the time you sent the email?	13:52
11	MR. FALCONER: Objection. Excuse me.	13:52
12	Objection. Form.	13:52
13	THE WITNESS: Again, I don't remember. I	13:52
14	know the email is there, so I don't want to	13:52
15	speculate what I was thinking because I don't know.	13:52
16	BY MR. LOESER:	13:52
17	Q. Do you ever go back and read your old emails	13:52
18	to try and understand what you were thinking at some	13:52
19	earlier time?	13:52
20	A. Generally, no. I have a lot of emails.	13:52
21	Q. Have you ever done that?	13:52
22	A. Have I ever looked at an email?	13:52
23	Q. Have you ever gone back and looked at an	13:52
24	email you wrote earlier to refresh your recollection	13:52
25	about what you were thinking at the time on a	13:52

A. I have done that. Q. And when you've done that that you're able to refresh your r something you were thinking by rea email? A. That depends. It depends B. That depends are the depends are the first and the question are the first and the question. Q. Do you need the question. Q. How about just answer the	Pa	.ge 136
Q. And when you've done that that you're able to refresh your r something you were thinking by rea email? A. That depends. It depends Q. Do you need the question A. Well, I can tell you, I d intent of the question.		13:52
that you're able to refresh your resonance of something you were thinking by readered email? A. That depends. It depends A. That depends is a second of the question of the question.		13:52
something you were thinking by read email? A. That depends. It depends A. The depends of the property of the	, have you found	13:52
6 email? 7 A. That depends. It depends 8	ecollection about	13:53
A. That depends. It depends D	ding your old	13:53
8 20 Q. Do you need the question A. Well, I can tell you, I d intent of the question.		13:53
Q. Do you need the question A. Well, I can tell you, I d intent of the question.	on whether that	13:53
21 A. Well, I can tell you, I d 22 intent of the question.		
21 A. Well, I can tell you, I d 22 intent of the question.		
21 A. Well, I can tell you, I d 22 intent of the question.		
21 A. Well, I can tell you, I d 22 intent of the question.		
21 A. Well, I can tell you, I d 22 intent of the question.		
21 A. Well, I can tell you, I d 22 intent of the question.		
21 A. Well, I can tell you, I d 22 intent of the question.		
A. Well, I can tell you, I d 22 intent of the question.		
A. Well, I can tell you, I d 22 intent of the question.		
A. Well, I can tell you, I d intent of the question.		
A. Well, I can tell you, I d 22 intent of the question.		
A. Well, I can tell you, I d intent of the question.		
22 intent of the question.	read back?	13:53
	on't understand the	13:54
Q. How about just answer the		13:54
	question.	13 : 54
A. I don't know.		13 : 54
25		

	Pa	ge 137
16 17	out. I had an objection to that last question as argumentative.	13:55 13:55
18	MR. LOESER: We can go to Exhibit 9. I will	
19	have this document marked as Exhibit 9. This is an	13:55
20	email from Brendan Moore to you, dated April 24th,	13:55
21	2013.	13:55
22	MR. FALCONER: Derek, I apologize. I'm	13:55
23	having a hard time hearing you. Is there any way	13:55
24	you can turn up your audio or move closer to the mic	13:55
25	or anything?	13:55

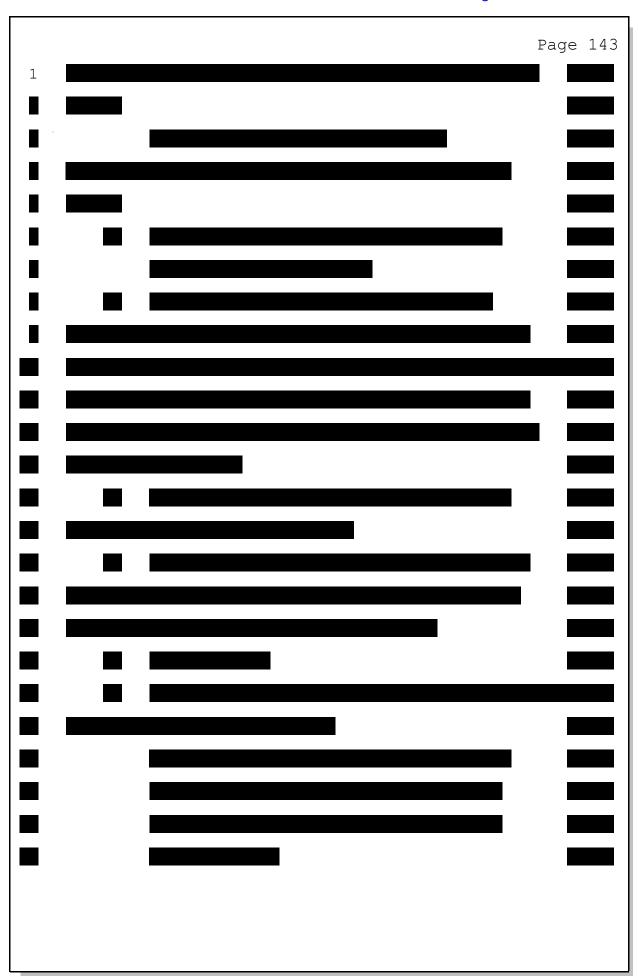
	Pag	ge 138
1	MR. LOESER: Let me try and change is	13:55
2	that any clearer?	13:55
3	MR. FALCONER: Yeah. That's a little	13:55
4	better. Thank you.	13:55
5	(Exhibit 9 marked for identification.)	13:55
6	BY MR. LOESER:	13:55
7	Q. Miss Chang, you are looking at an email from	13:55
8	Brendan Moore to, it looks like, himself and also to	13:56
9		
11	Do you see that?	13:56
12	A. Yes.	13:56
13	Q. Who is Brendan Moore?	13:56
14	A. He was a colleague of mine.	13:56
15	Q. Okay. Do you know what his job was at the	13:56
16	time?	13:56
17	A. He was a data analyst. I don't know if he	13:56
18	was an intern or full time at the time.	13:56
19	Q. And this email, it looks like it forwards a	13:56
20	chat; is that is that right?	13:56
21	A. It looks to be. I'm not sure.	13:56
22	Q. Okay. And it appears that you had you	13:56
23	were communicating with Mr. Moore via chat and that	13:56
24	he sent that communication to himself and to you; is	13:56
25	that right?	13:56

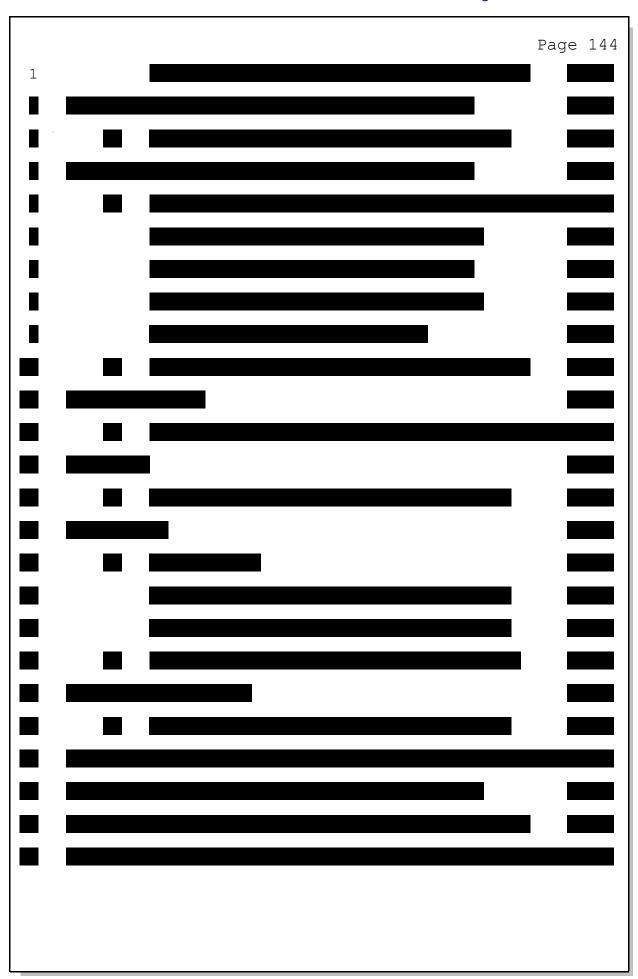
	Pa	ge 139
1	MR. FALCONER: Objection. Foundation.	13:56
2	THE WITNESS: I don't know what his intent	13:57
3	was. I don't know if that was true or not.	13:57
4	BY MR. LOESER:	13:57
5	Q. Well, I'm not asking about his intent. I'm	13:57
6	just looking at the document and trying to	13:57
7	understand what it is. Does it appear to reproduce	13:57
8	a chat that you had with Mr. Moore?	13:57
9	A. I don't know.	13:57
10	Q. Okay.	13:57
11	MR. FALCONER: Derek, can I if I	13:57
12	represent that this is just how chats get produced	13:57
13	in discovery, does that help? Is that helpful?	13:57
14	MR. LOESER: That is. Thank you.	13:57
15	BY MR. LOESER:	13:57
16		
1		

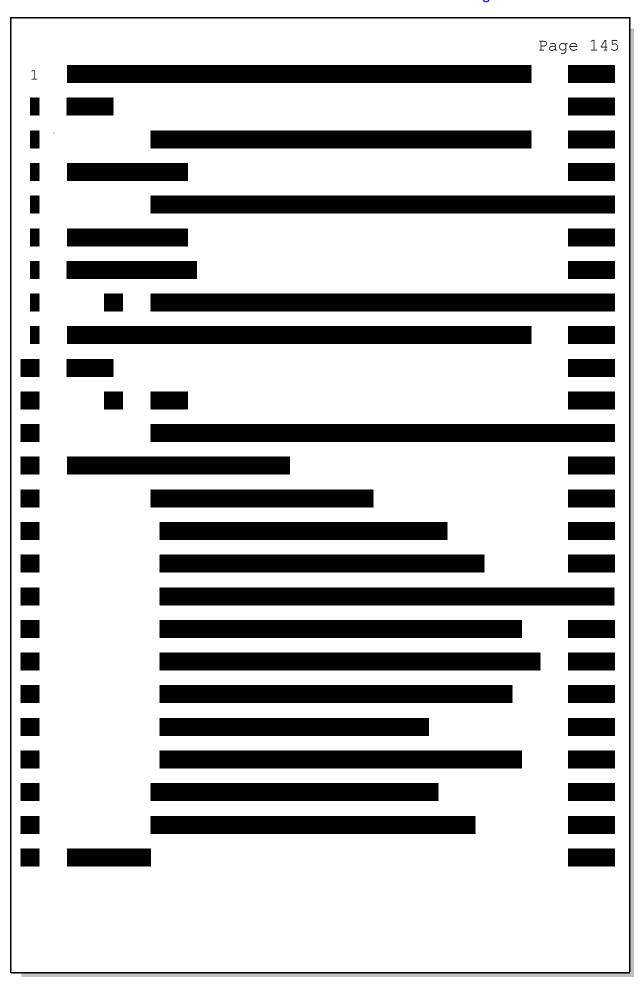
	Α.	Okay. What is GK generally? A gatekeeper.	Page 140 13:59 13:59
23	Q.	Okay. And what is that?	13:59
24	Α.	I don't know the technicals behind that, s	0 13:59
25	I'm sure	I'm explaining incorrectly, but from what	I 13:59

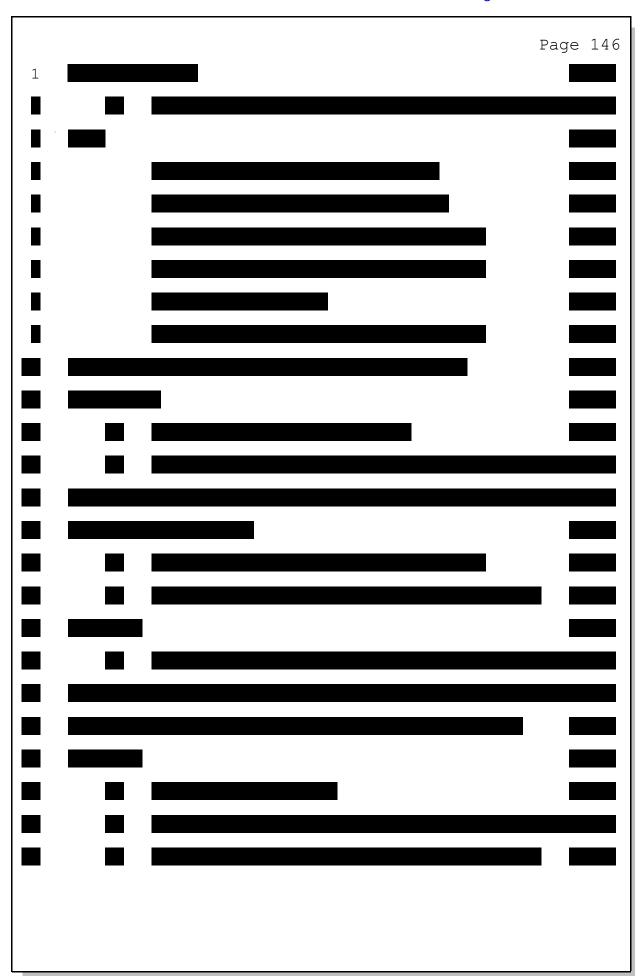
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	Pa	ge 141
1	understand, it's some sort of permissioning	13:59
2	permissioning system.	13:59
3	Q. Permissioning for partners to get access to	13:59
4	permissions; is that right?	13:59
5	A. Again, I don't know where I can make that	13:59
6	assertion. It's more technical than I'm familiar	13:59
7	with.	13:59
8		

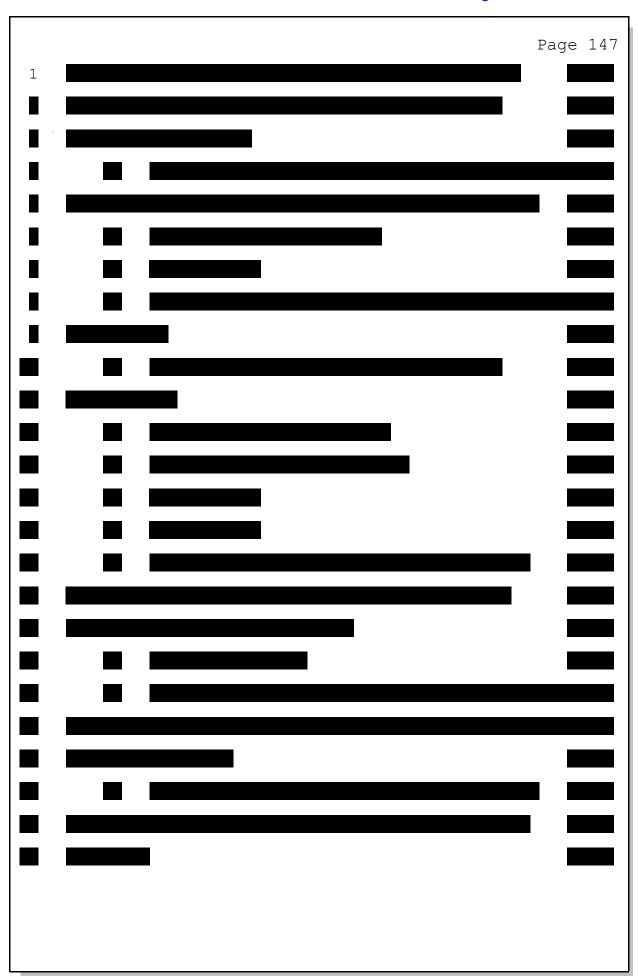
		Page 142
1		
2	Q. Do you know what a "vertical" is?	14:00
3	A. A vertical, I think it depends on what	
4	context it's being used.	14:00
5		
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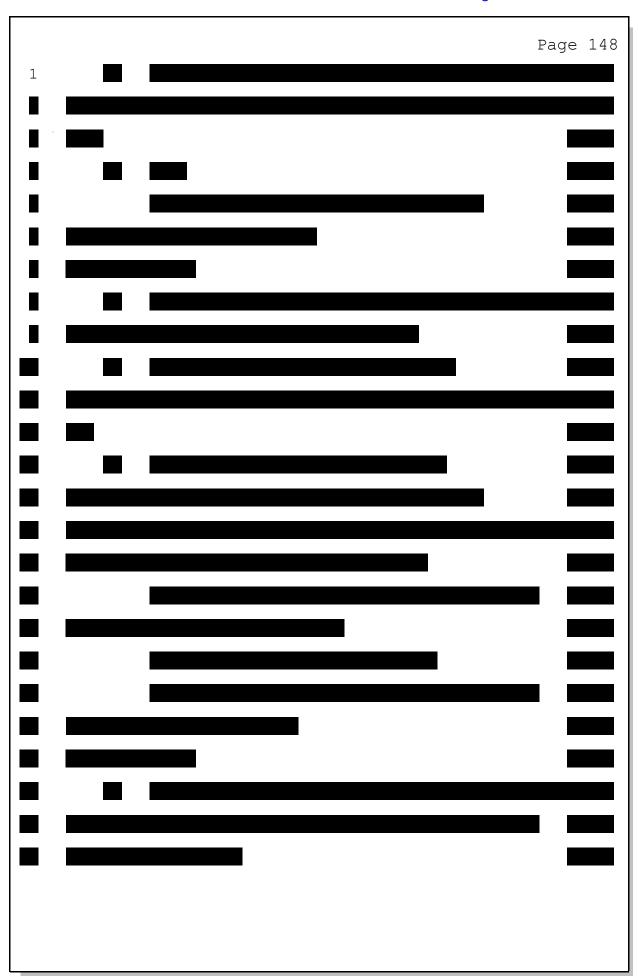




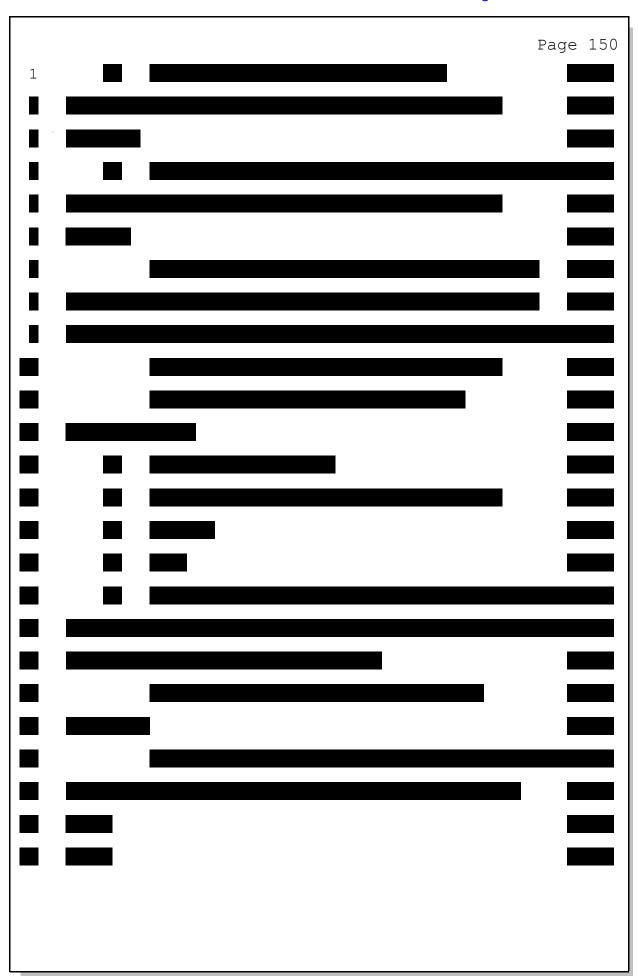


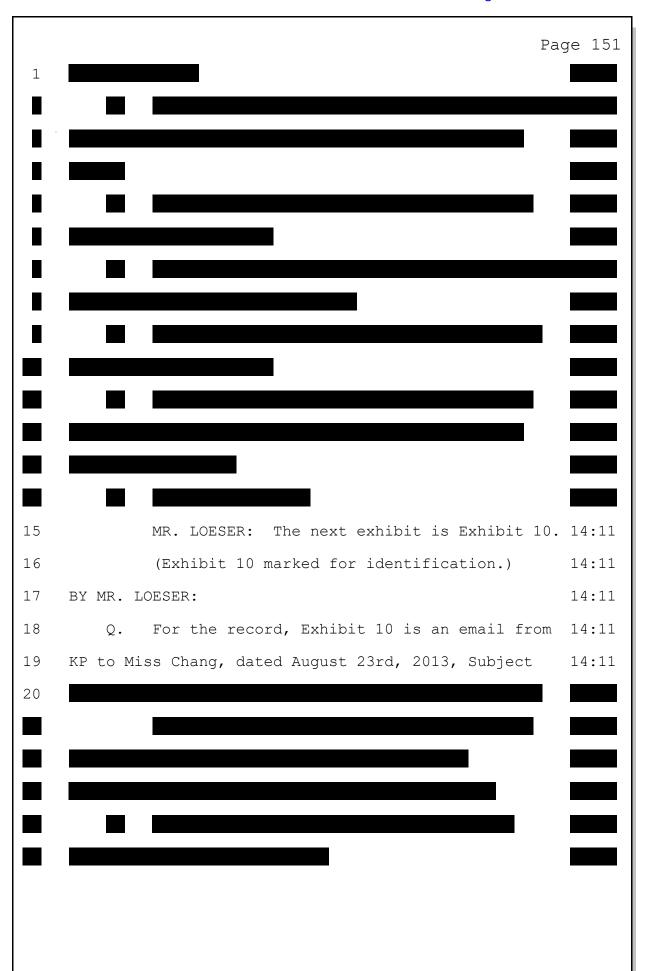




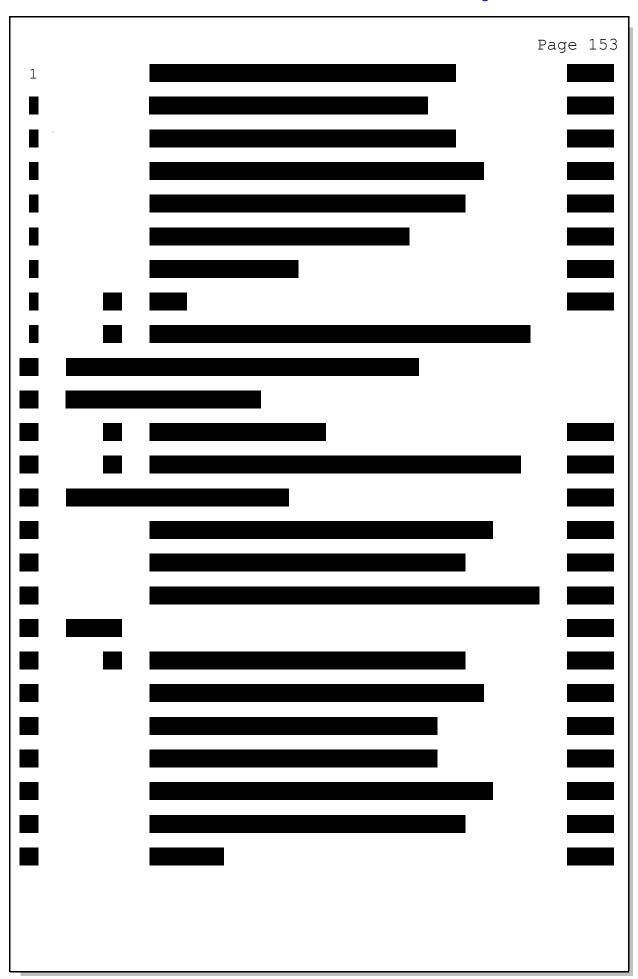


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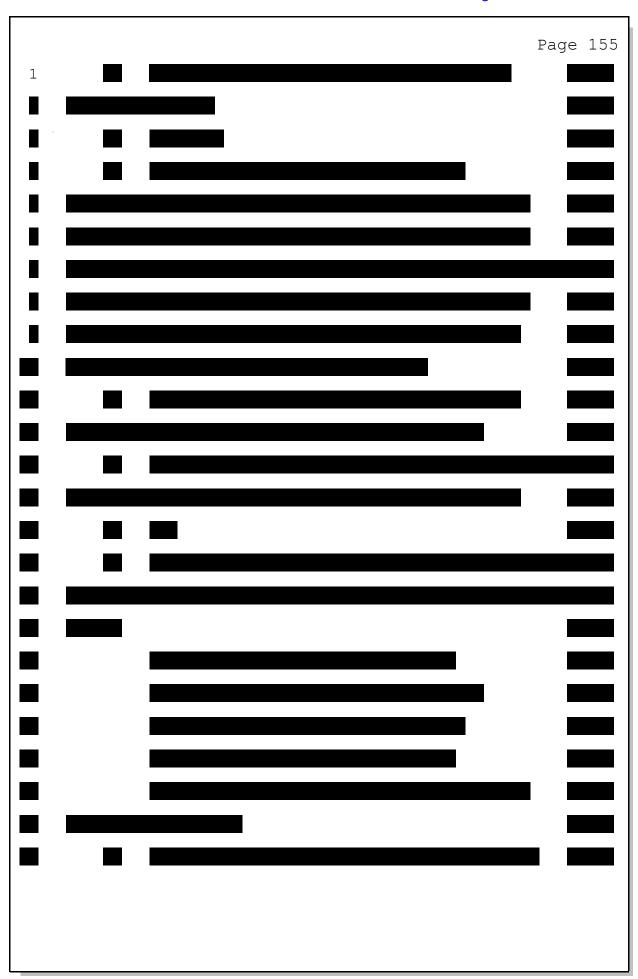


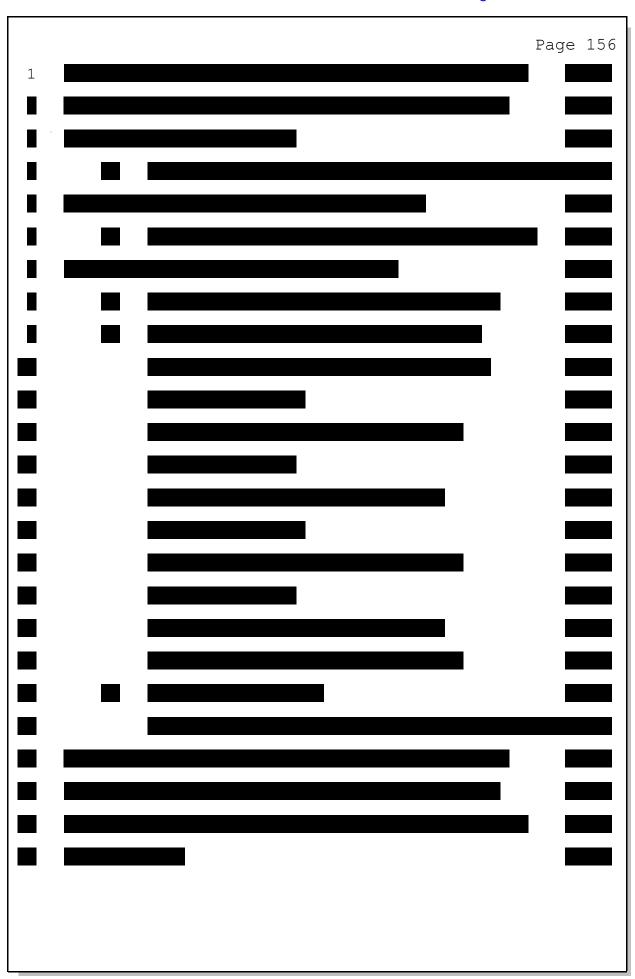


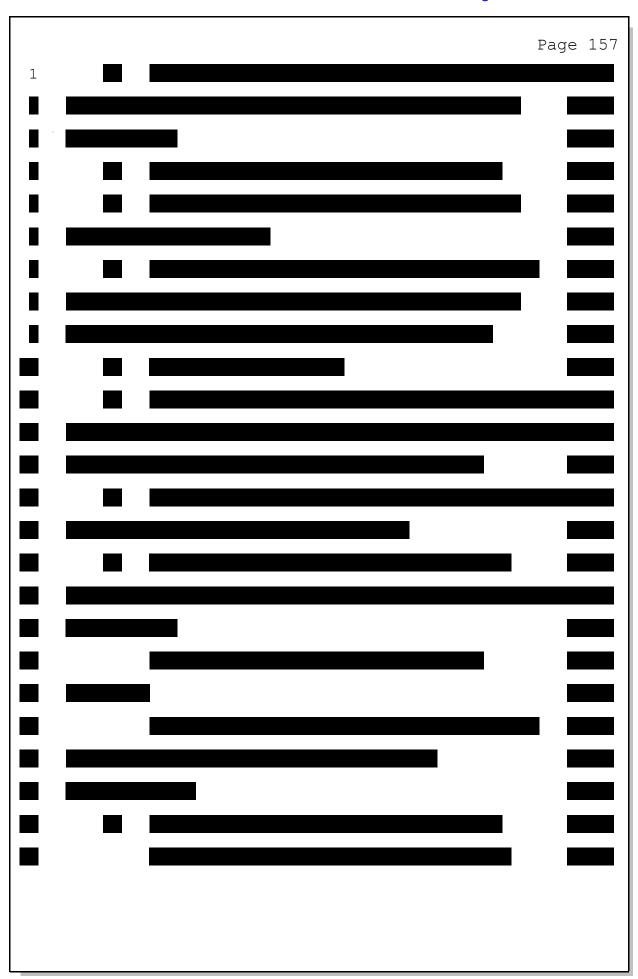
	Pag	ge 152
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5	Q. Okay. Now, as we as I mentioned a moment	14:14
6	ago, this is an email from KP to you that starts an	14:14
7	email string. And the subject is the same as the	14:14
8	subject of the earlier August 21st email that we	14:14
9	talked about.	14:14
10	And if you go down to the email at the	14:14
11	bottom of the first page, or midway through the	14:14
12	first page, it's an email from you to Chris Daniels,	14:14
13	Ime Archibong and KP, with a CC to Simon Cross,	14:14
14	dated August 22nd, 2013. Do you see that?	14:14
15	A. Yes.	14:14
16		

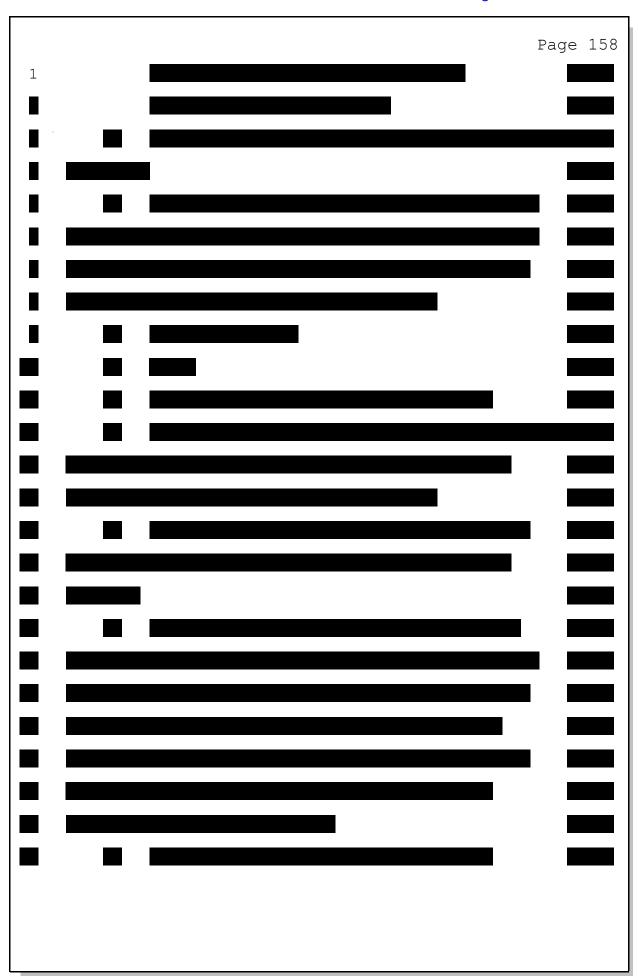


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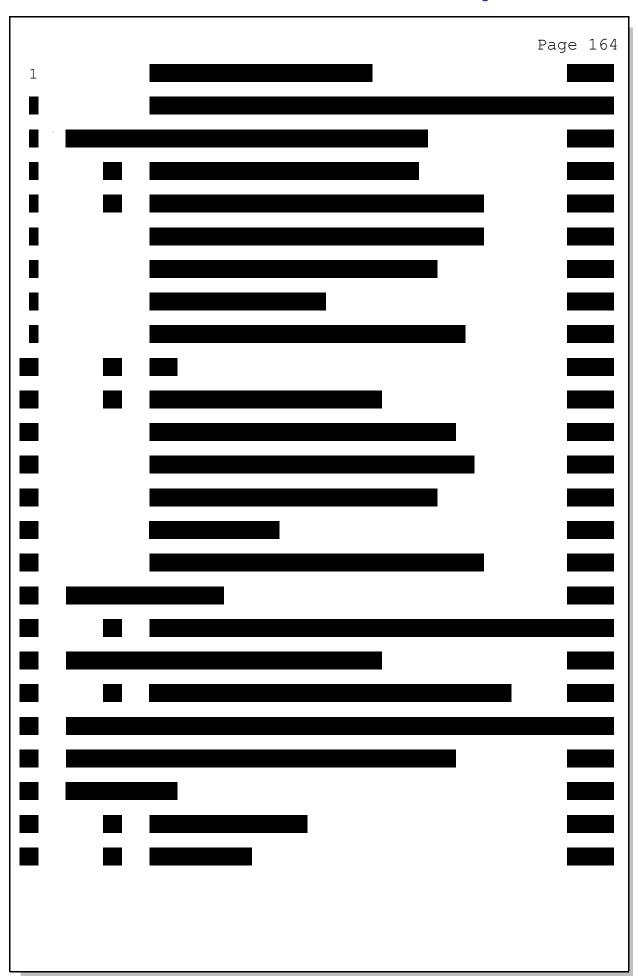
		ge 159
1	MR. LOESER: We can put that document aside,	
2	and I will introduce Exhibit 11, which for the	14:22
3	record is an email from Simon Cross to Ime	14:22
4	Archibong, Jackie Chang, and KP, dated September	14:22
5		
7	(Exhibit 11 marked for identification.)	14:23
8	BY MR. LOESER:	14:23
9	Q. So, Miss Chang, if you look at this email,	14:23
10	who is Simon Cross?	14:23
11	A. He was a colleague.	14:23
12	Q. Okay. Was he in the same department or do	14:23
13	you recall what his position was?	14:23
14	A. I think he was a partner manager at this	14:23
15	time.	14:23
16	Q. Okay. Does that mean you were reporting to	14:23
17	him or he was reporting to you?	14:23
18	A. I was reporting to Ime and I had no reports.	14:23
19		

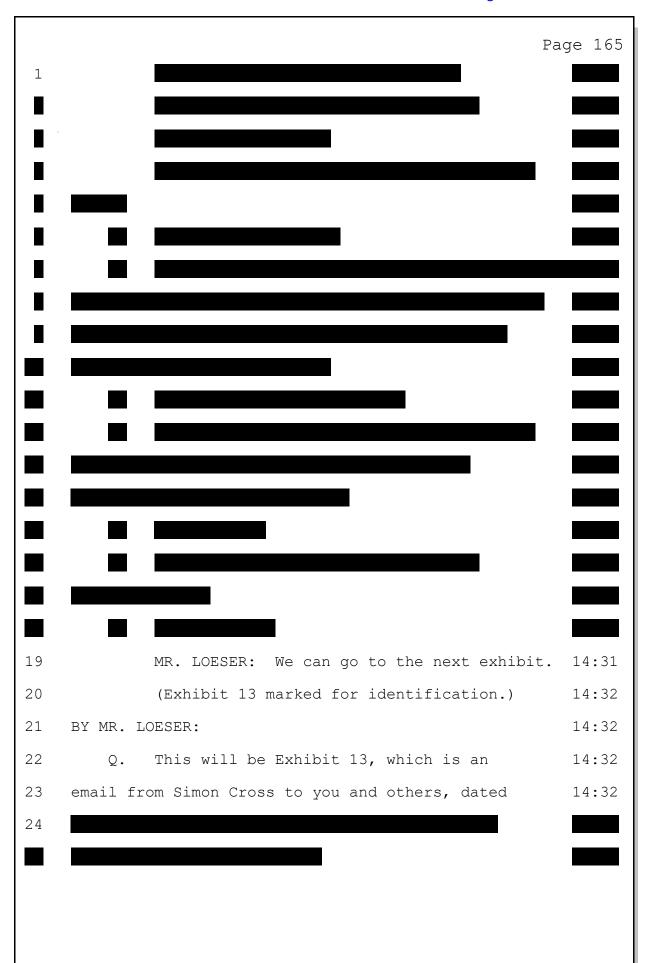
	Pa	ge 160
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3	MR. FALCONER: Objection. Foundation.	14:24
4	MR. LOESER: All right. Let's turn to the	14:24
5	attachment, which we will introduce as Exhibit 12.	14:24
6	(Exhibit 12 marked for identification.)	14:24
7	BY MR. LOESER:	14:24
8	Q. And I will represent for the record,	14:24
9	Miss Chang, that Exhibit 12 is the document that was	14:24
10	attached to Mr. Cross' email that went to you, among	14:24
11	others.	14:24
12		

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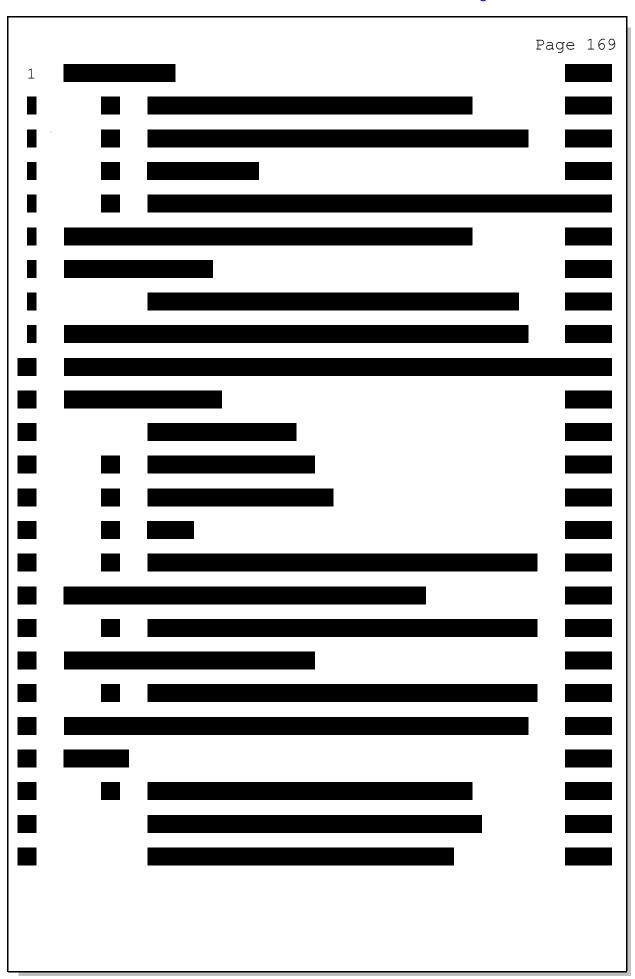


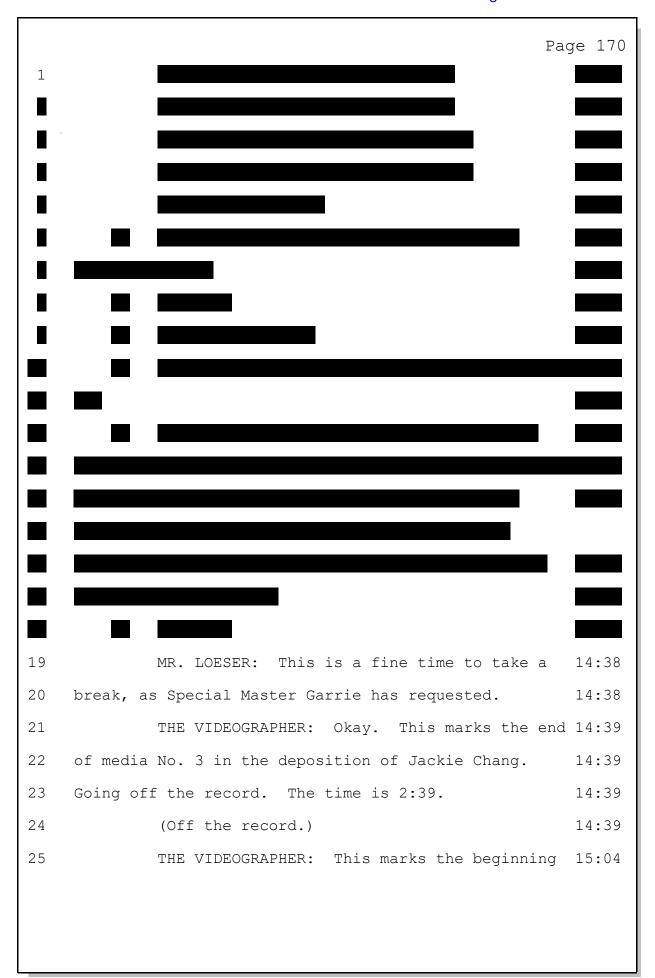


		Pa	ge 166
1		Do you see this document, Miss Chang?	14:32
2	Α.	Now, I do. Can I have time to read through	14:32
3	it?		14:33
4	Q.	Sure.	14:33
5	Α.	Okay.	14:33
6	Q.	And if you flip through this email string,	14:33
7			

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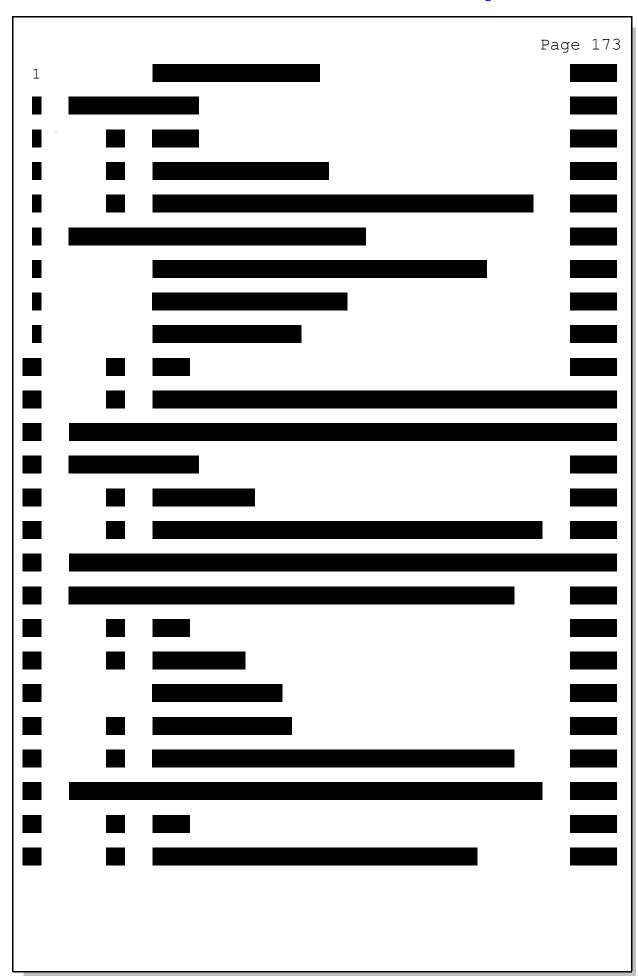
1	Pa	ge 168
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6	SPECIAL MASTER GARRIE: Sorry. When we get	14.36
7	to a breaking point any idea when that may be?	
8	MR. FALCONER: I was thinking after the	
9	next after we are done with this document.	
10	MR. LOESER: That's fine.	14:36
11	SPECIAL MASTER GARRIE: And then I would	
12	like all the lawyers to be moved into another room.	
13	Thank you.	14:36
14	BY MR. LOESER:	14:36
15	Q	

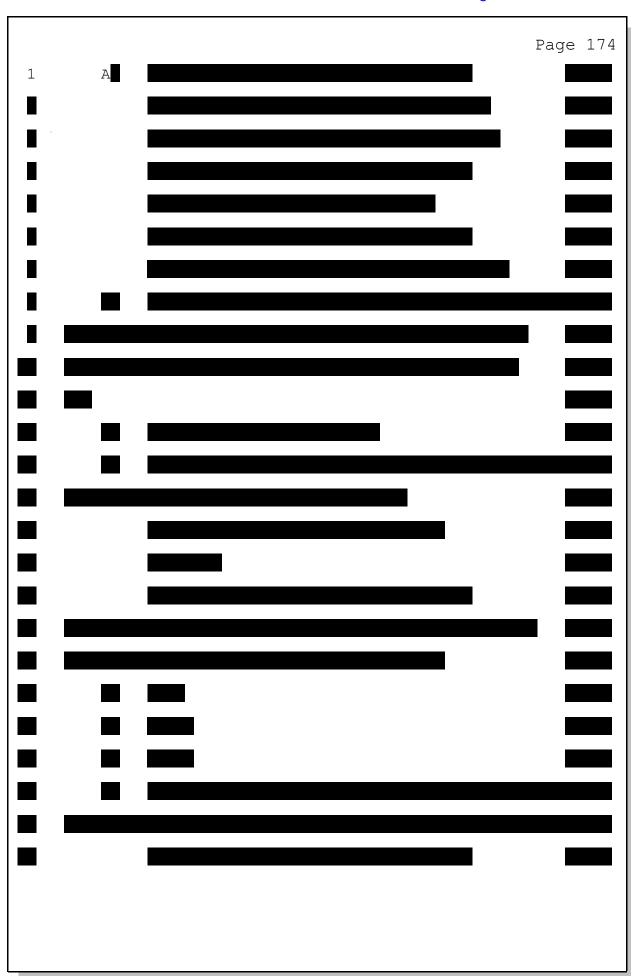




	Pac	ge 171
1	of media No. 4 in the deposition of Jackie Chang.	15:04
2	We are back on the record. The time is 3:04.	15:04
3	MR. LOESER: If we could mark as Exhibit 14	15:04
4	the next document, which for the record is an email	15:04
5	from Ime Archibong to Eddie O'Neil and Simon Cross,	15:04
6		
8	(Exhibit 14 marked for identification.)	15:05
9	BY MR. LOESER:	15:05
10	Q. Miss Chang, do you see this email?	15:05
11	A. Yes.	15:05
12	Q. And do you see that the email forwards an	15:05
13	email from Ime Archibong to you and Simon Cross on	15:05
14	the same day, February 9th, 2014?	15:05
15	A. Yes.	15:05
16	Q. What does it mean when an email is marked as	15:05
17	"Importance High"?	15:05
18	MR. FALCONER: Objection. Foundation.	15:05
19	THE WITNESS: That it's of high importance.	15:05
20	BY MR. LOESER:	15:05
21	Q. Okay. And if we look down to the email in	15:05
22	the middle of the page, a little further, there's an	15:05
23	email from you, part of this string, to is it	15:05
24	Ime? Ime Archibong? Am I saying that right?	15:06
25	A. Ime.	15:06

	Pag	se 172
1	Q. Ime to Ime and Simon Cross, and that's	15:06
2	the email that's forwarded above and then forwarded	15:06
3	above that; is that right?	15:06
4	A. Yes. Sorry, is it okay if I read the email?	15:06
5	Q. Absolutely. Yeah.	15:06
6	A. Okay.	15:07
7	Q. Okay. Let's start at the very beginning of	15:07
8	this string, if you go to the second page. At the	15:07
9	very bottom of the string is an email from Ime to	15:07
10		
25	MR. FALCONER: Objection. Foundation.	15:08



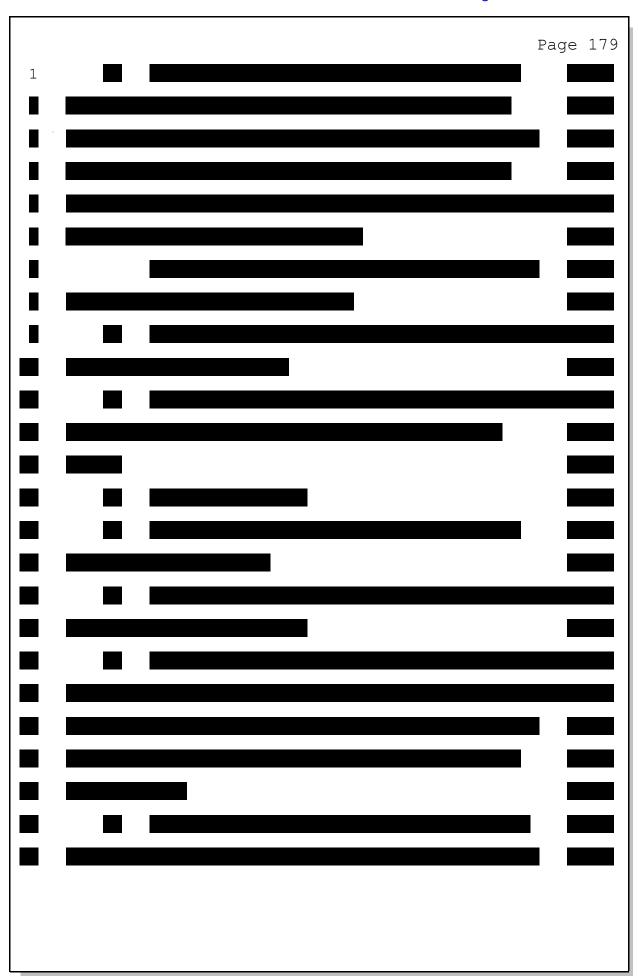


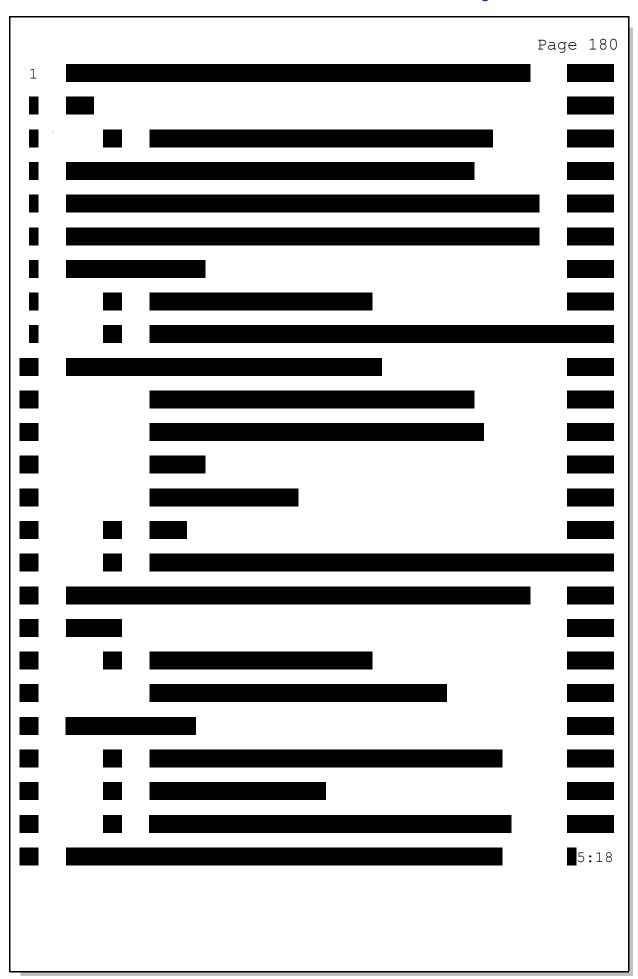
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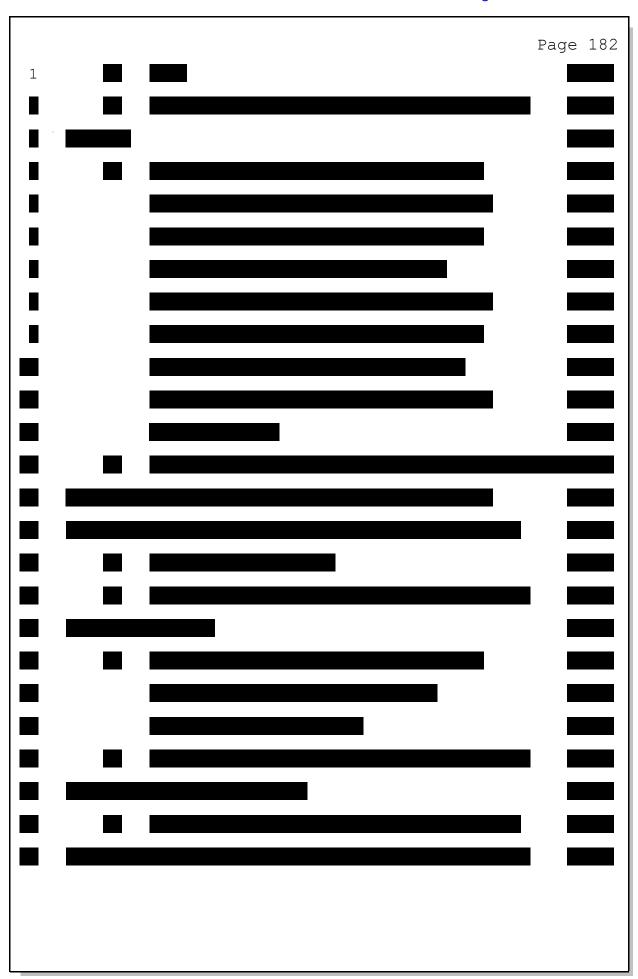
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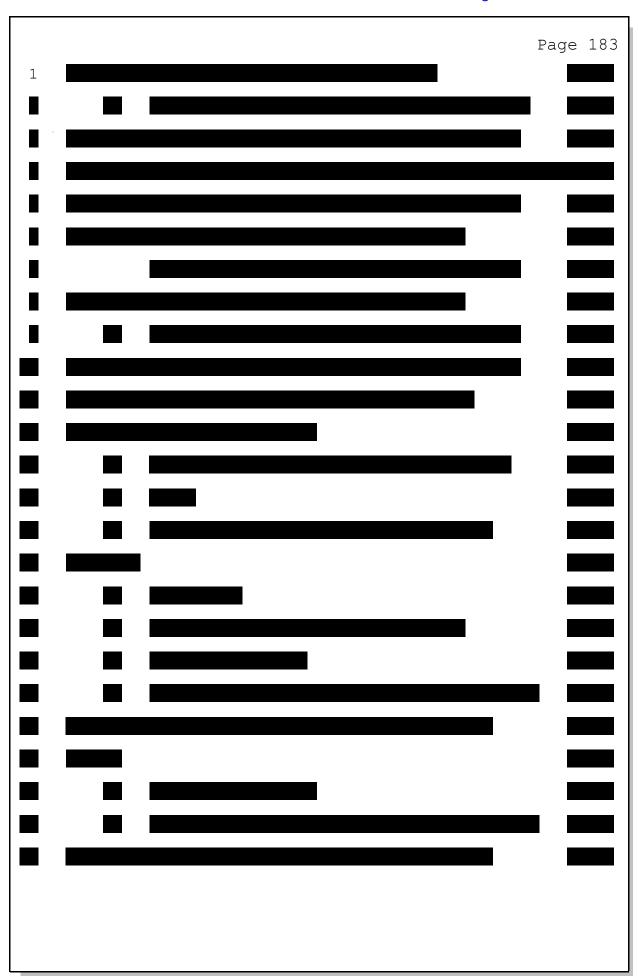
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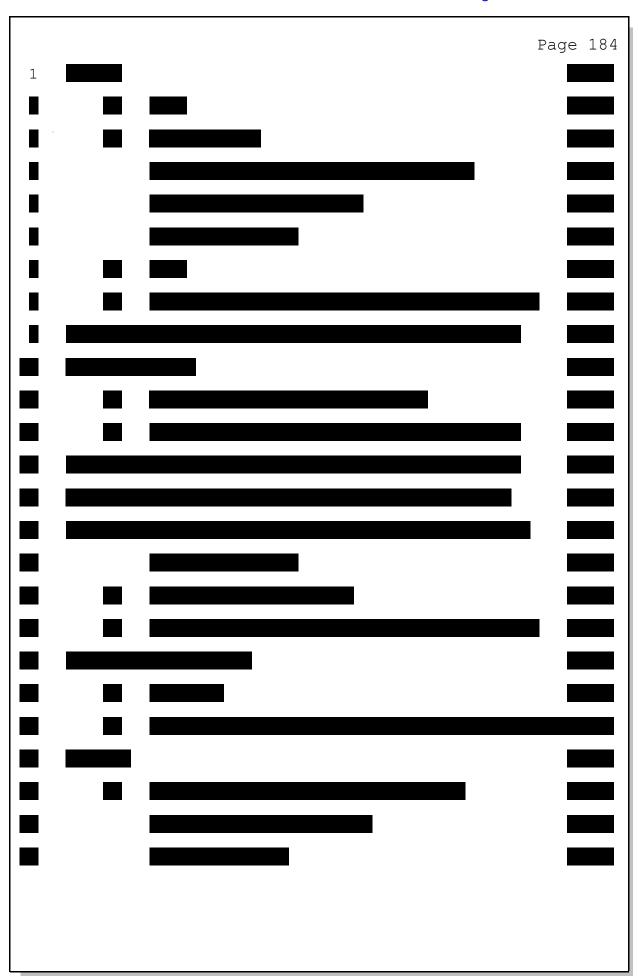


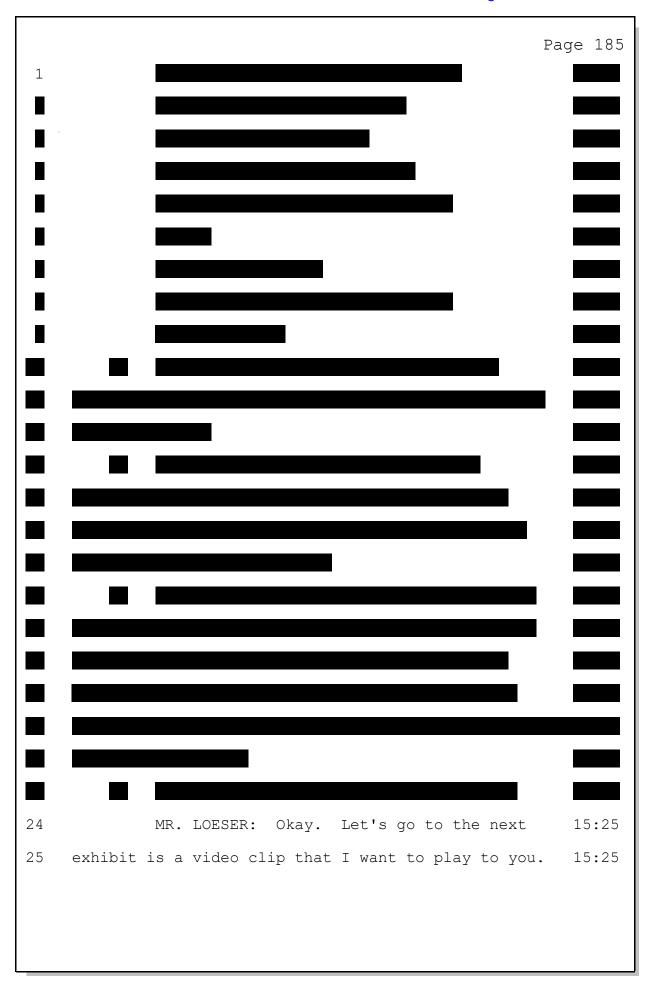


1	Pa	ge 181
6	MR. LOESER: Okay. And I will represent to	15:19
7	you that the next document is the attachment to that	15:19
8	email. And I don't I don't see a reference to	15:19
9	attachment either, so I'm not sure how that works.	15:19
10	But I think in the manner it was produced, this was	15:19
11	attached to that email.	15:19
12	And we'll confirm that for the record later,	15:19
13	Russ, just to make sure that we are right about	15:19
14	that, but that's my understanding.	15:19
15	So if we could look at Exhibit 15.	15:19
16	(Exhibit 15 marked for identification.)	15:19
17	BY MR. LOESER:	15:19
18		

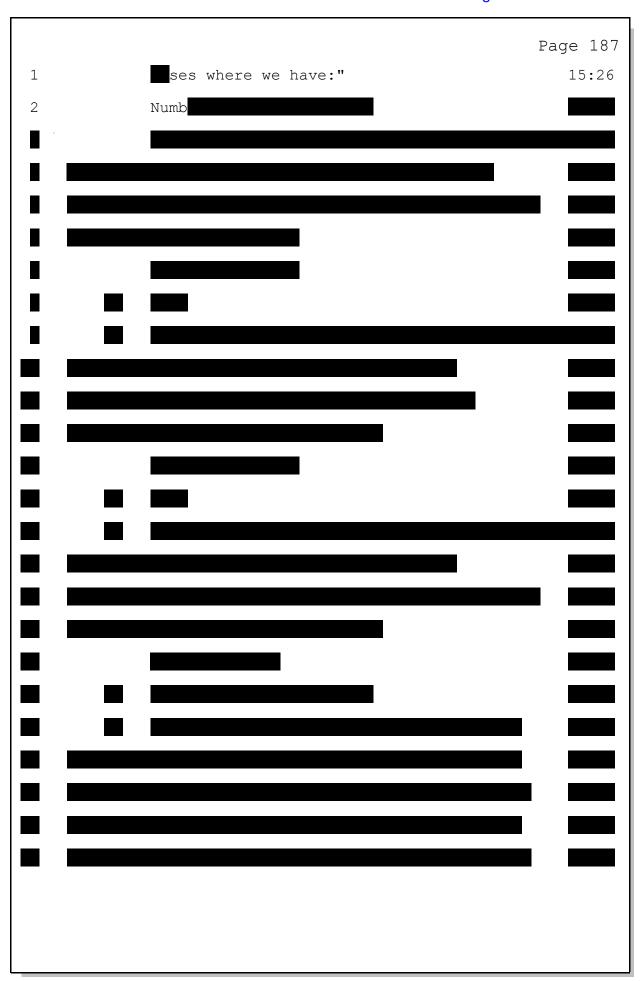


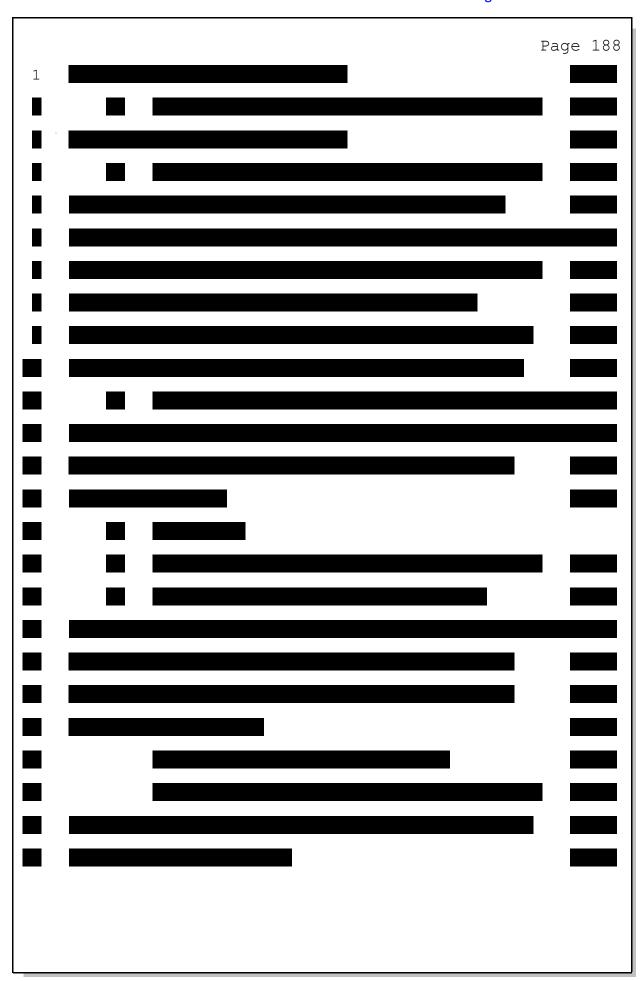






		Page 186
1	And it's not very long. And then we'll have a	15:25
2	transcript of it as well to the extent that it is	15 : 25
3	not clear.	15:25
4	DEPOSITION REPORTER: Excuse me, Counsel,	15:25
5	are you going to want this reported?	15:25
6	MR. LOESER: I think you'll be able to.	15:25
7	It's not it's Mark Zuckerberg speaking and he's	15:25
8	not speaking terribly quickly, but we have a	15 : 25
9	transcript so you know what, I wouldn't bother	15 : 25
10	reporting it. We will just have the transcript	15 : 25
11	admitted after we play the recording.	15:25
12	DEPOSITION REPORTER: Thank you.	15:25
13	MR. LOESER: Actually, hang on one second	l 15:25
14	before we do that. If we can go back to the last	15 : 26
15	exhibit.	15 : 26
16	BY MR. LOESER:	15:26
17		





	P	age 189
1		
7	MR. LOESER: Okay. We can go to the next	15:29
8	exhibit.	15:29
9	(Exhibit 16 and Exhibit 17 marked for	15:29
10	identification.)	15:29
11	BY MR. LOESER:	15:29
12	Q. Now, having gone through all these emails	15:29
13	now, do you remember the connection between the	15:29
14	introduction of the new platform and the transition	15:30
15	from Graph API version 1 to version 2?	15:30
16	A. I don't remember in specificity like what	15:30
17	date and things around that. This was a lot of	15:30
18	stuff going on that's all blurred together, so not	15:30
19	with like full certainty.	15:30
20	Q. And do you remember, as a general matter,	15:30
21	that when the new platform came on and there was a	15:30
22	transition from the older Graph to the new Graph,	15:30
23	that two of the things specifically that happened	15:30
24	was that friends permissions were publicly	15:30
25	deprecated; right?	15:30

	Pa	ge 190
1	MR. FALCONER: Objection. Form.	15:30
2	BY MR. LOESER:	15:30
3	Q. I'm sorry. Let me ask again.	15:30
4	Putting aside the terminology and what Graph	15:30
5	version it was and what platform it was, there was a	15:30
6	new platform that was introduced. And in that	15:30
7	new that new platform, Facebook publicly	15:30
8	announced that it was that it was deprecating	15:30
9	friend permissions; right?	15:30
10	MR. FALCONER: Objection. Form.	15:30
11	THE WITNESS: I think so. I don't I	15:31
12	don't remember specifically like which announcement.	15:31
13	Sorry, there's a lot of F8s, so I think this is what	15:31
14	the picture is, so I don't remember.	15:31
15	MR. LOESER: Yeah. Let's go ahead and play	15:31
16	this. Maybe it will jog your memory.	15:31
17	(Video played.)	15:31
18	MR. LOESER: Let's try this again because	15:31
19	there is an echo.	15:31
20	(Video played.)	15:31
21	BY MR. LOESER:	15:32
22	Q. We'll go through the transcript itself	15:32
23	because there was some echo there.	15:32
24	But you know what an "F8 Conference" is?	15:32
25	A. Yes.	15 : 32

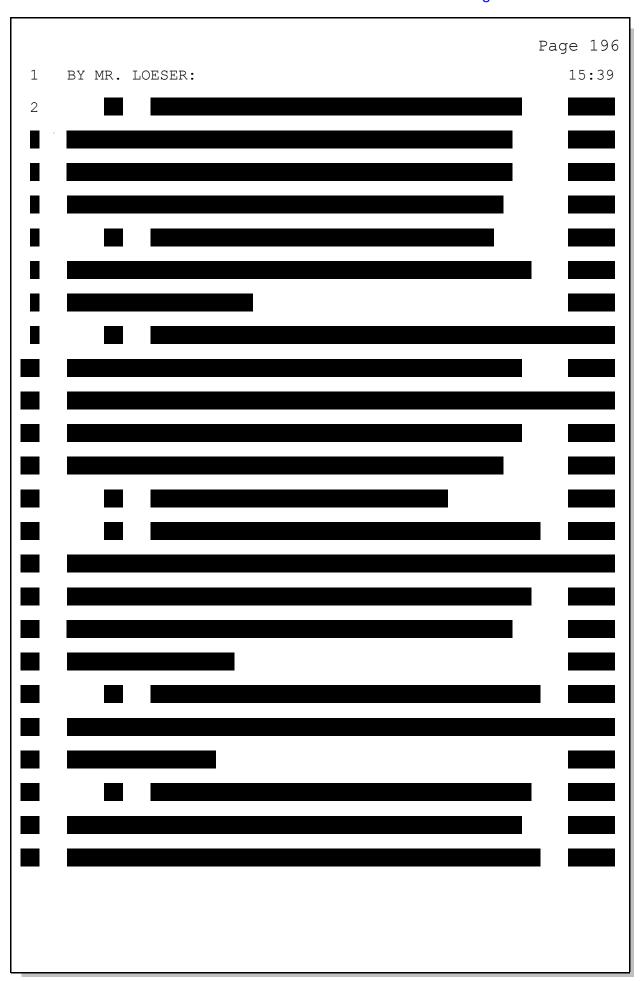
	Pa	ıge 191
1	Q. And what we just showed you was from the	15 : 32
2	April 30th, 2014 F8 Conference. And do you recall,	15:32
3	did you attend that conference?	15:33
4	MR. FALCONER: Objection. Form.	15:33
5	THE WITNESS: I actually, I don't	15 : 33
6	remember. I've been to many, but I don't know the	15 : 33
7	exact dates of which ones I've gone to, and I've	15 : 33
8	also missed some, as well, so I don't know which	15 : 33
9	one.	15:33
10	BY MR. LOESER:	15:33
11	Q. Okay. And I'm going to read for you what	15:33
12	Mr. Zuckerberg just said, and you can tell me if	15:33
13	this refreshes your recollection of whether you were	15:33
14	in attendance at this conference.	15:33
15	What Mr. Zuckerberg said was:	15 : 33
16	"We've also heard that sometimes you	15:33
17	can be surprised when one of your	15:33
18	friends shares some of your data with	15:33
19	an app. So now we're going to change	15:33
20	this and we're going to make it so	15:33
21	that now everyone has to choose to	
22	share their own data with an app	15:33
23	themselves. We think this is really"	15:33
24	important "a really important step	15:33
25	for giving people power and control	15 : 33

	Pa	ge 192
1	over how they share their data in	15 : 33
2	apps."	15 : 33
3	Do you recall Mr. Zuckerberg saying that?	15 : 33
4	A. Again, I don't remember. A lot of these all	15 : 33
5	blurred together, so I don't remember that specific	15 : 34
6	one.	15:34
7		
17	Q. Okay. And so when Mr. Zuckerberg is talking	15:34
18	about how friends permissions were going away, at	15:34
19	the time he was saying that in April 30th, 2018	15:34

		Page 193
1	Q. Let's go back to your February 9th, 2014	15 : 35
2	email, which is Exhibit 14. And, again, what you	15 : 35
3	wrote was:	15 : 35
4		

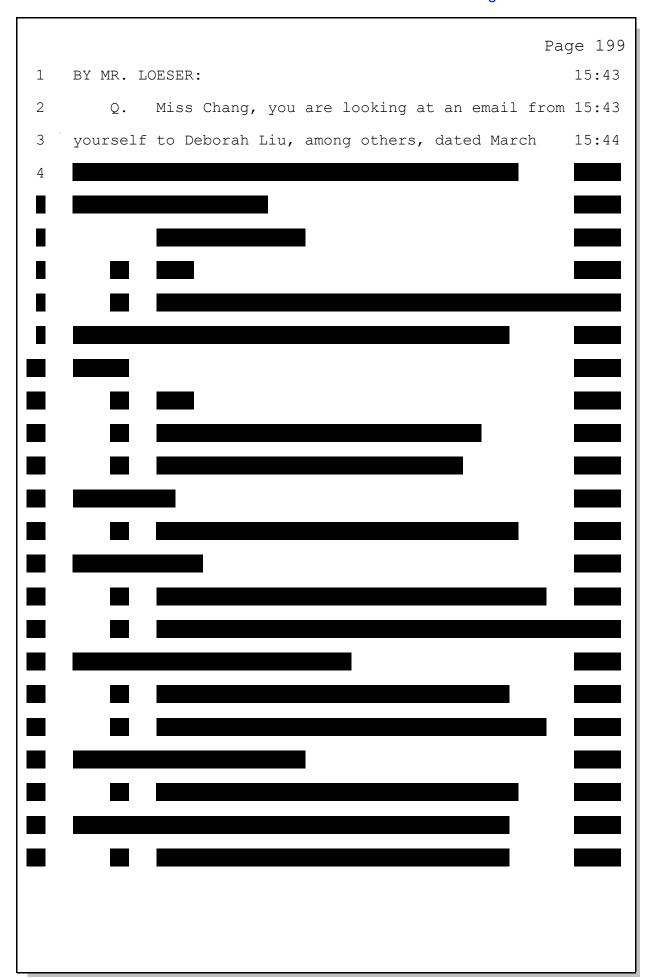
	Pac	ge 194
1		
15	Q. Okay. And, then, on April 30th,	15 : 37
16	Mr. Zuckerberg publicly announced that friends	15:37
17	permissions were going away; right?	15 : 37
18	A. Per that video, yes.	15 : 37
19	Q. And, in fact, he said, "We're going to make	15:37
20	it so that now everyone has to choose to share their	15 : 37
21	own data with an app themselves"; right?	15 : 37
22	A. Yes.	15 : 37
23	Q. And so that would mean that no app would get	15:37
24	access to data about anyone other than the Facebook	15 : 37
25	user using the app. Isn't that what he described?	15 : 37

			Page 195
1	Α.	Yes.	15 : 37
2	Q.	Now, Mr. Chang, you knew at the time	15 : 37
3	Α.	Sorry, Mrs.	15:37
4	Q.	Miss Chang. I'm sorry.	15:37
5	Α.	Yeah.	15 : 38
6			
22	Q.	So that's a yes?	15:39
23		MR. FALCONER: Objection. Foundation and	d 15:39
24	form.		15 : 39
25	/ / /		15:39
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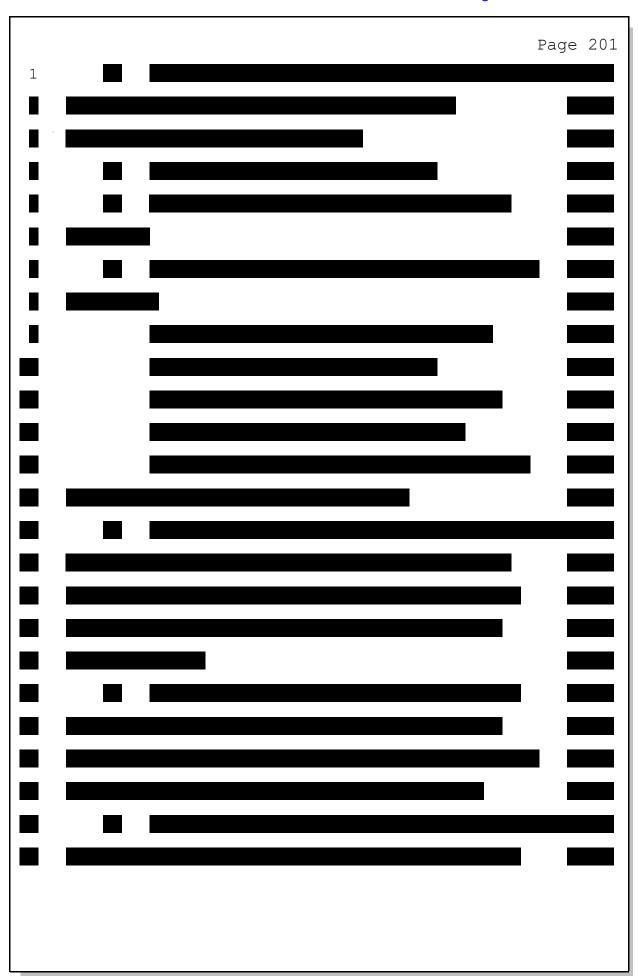


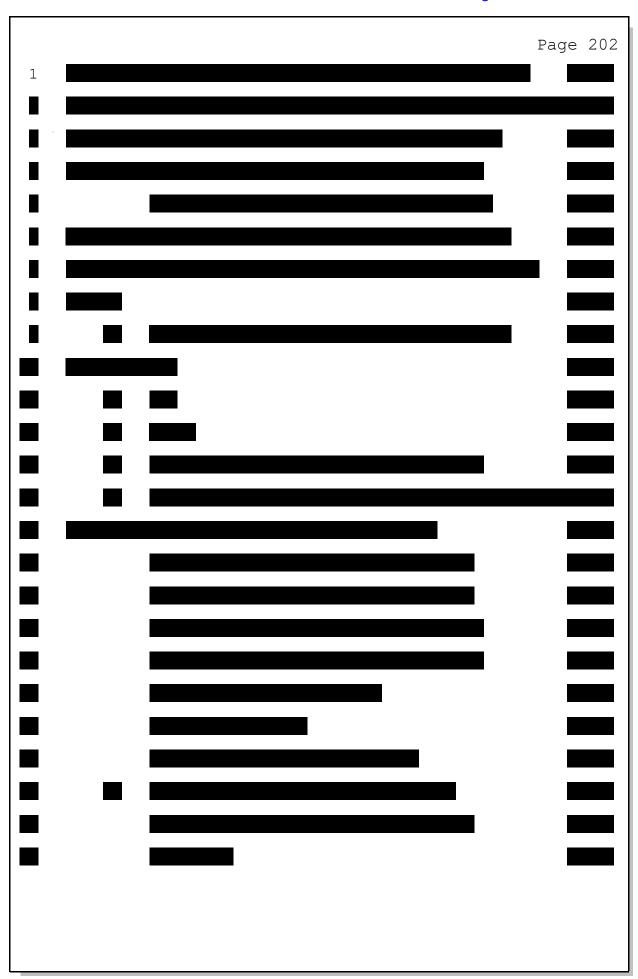
1			Page 197
			15.40
11	Q.	Now, Mr. Zuckerberg said:	15:40
12		"We're going to make it so that now	15:41
13		everyone has to choose to share their	15:41
14		own data with an app themselves."	15:41
15		Is that right?	15:41
16	Α.	Correct.	15:41
17	Q.	And yet, for those apps and developers th	
		inued access to friend data, that wasn't	15:41
	true; ri		15:41
20	Α.	<pre>I I don't think so, because I think wh</pre>	
_	-	aying is that users have to choose. And a	
		on, from my understanding, is the ability	
		dialogue to ask for permission. So the	15:41
		ld still have to choose to provide it.	15:41
25	Q.	So when a private API provides a partner	15:41

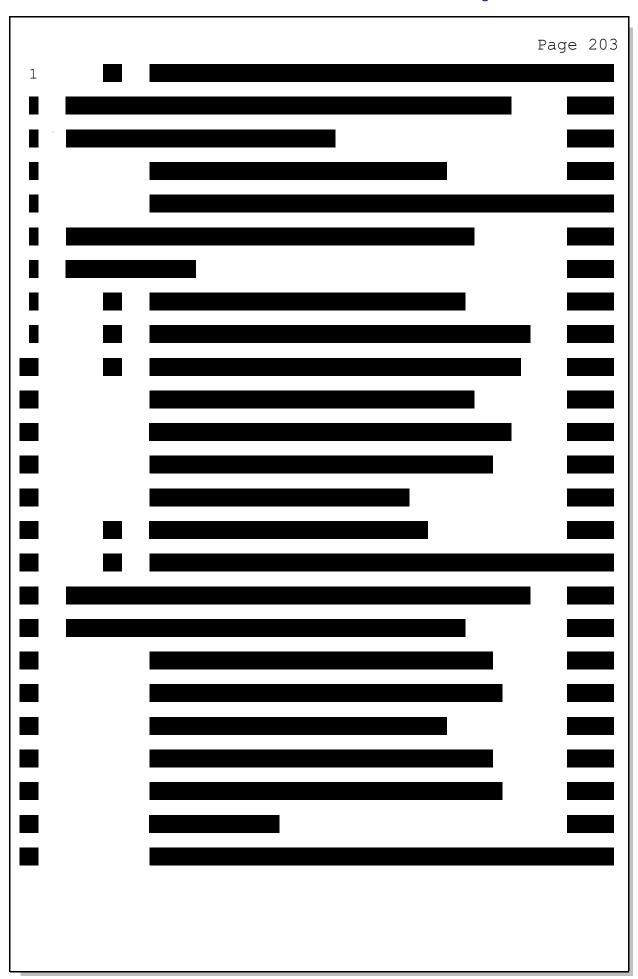
	Pac	ge 198
1	with access to friend data permissions, right, that	15:41
2	partner can access friend data through that	15:41
3	permission; is that right?	15:41
4	A. My understanding	15:41
5	MR. FALCONER: Objection. Objection. Form.	15:42
6	THE WITNESS: My understanding is that it's	15:42
7	the ability to ask a user for that.	15:42
8	BY MR. LOESER:	15:42
9	Q. And now, you didn't hear Mr. Zuckerberg	15:42
10	say at that keynote address that there was a	15:42
11	population of partners that would continue to have	15:42
12	access to friends data, did you?	15:42
13	A. No, I didn't hear that.	15 : 42
14	Q. And, Miss Chang, do you recall that you	15 : 42
15	that you attended that conference and you were	15 : 42
16	involved in you had a presentation yourself	15 : 42
17	there?	15 : 42
18	A. I don't know if it was that year. I have	15:42
19	been involved at F8. I have been a couple years. I	15:42
20	don't know if it was that specific one.	15:42
21	So, yes, it could be possible. I just I	15:43
22	don't remember that specific one.	15:43
23	MR. LOESER: Okay. We can go to the next	15:43
24	exhibit. It's Exhibit 18.	15:43
25	(Exhibit 18 marked for identification.)	15:43

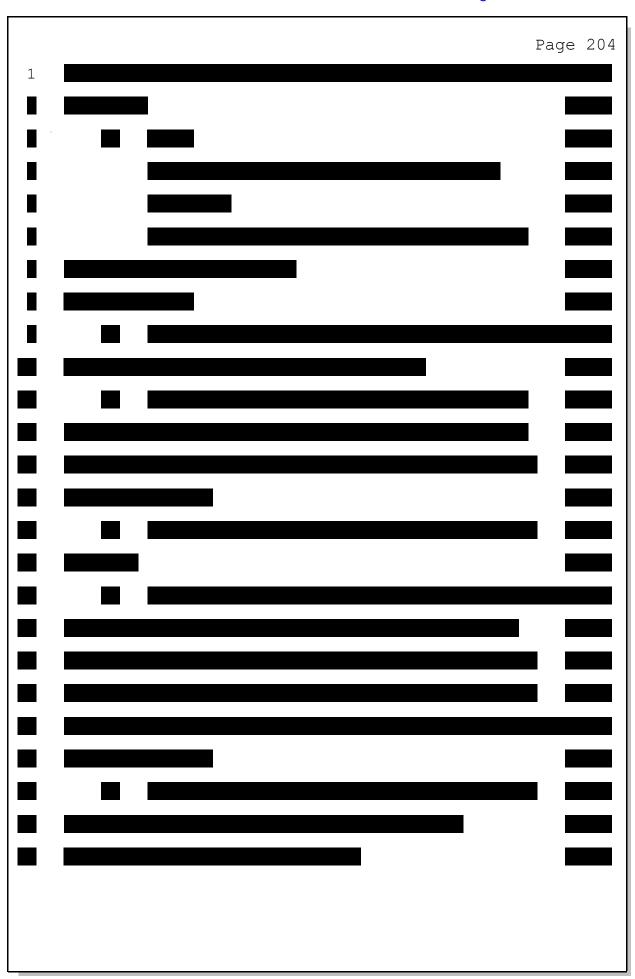


			Page 200
1			
10	Α.	Is it okay if I read through?	15:46
11	Q.		15:46
12 13	A. Q.	-	15:46 15:46
14		I just have a couple questions, so if you skim it, you can probably save yourself som	
15	time.	skim it, you can probably save yourself som	15:46
16		Okay. Yes. Okay.	15 : 46

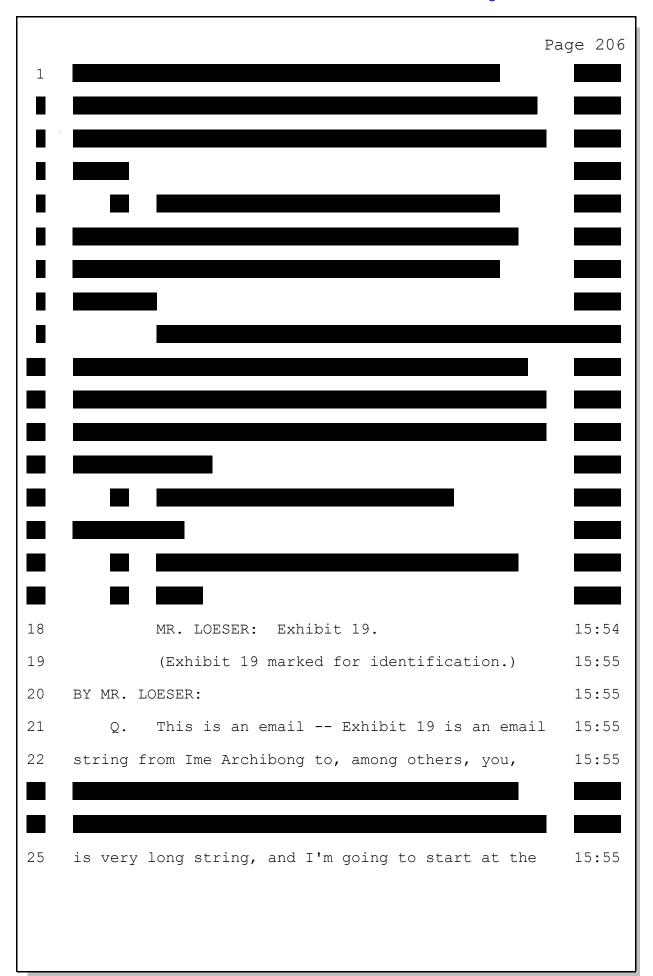




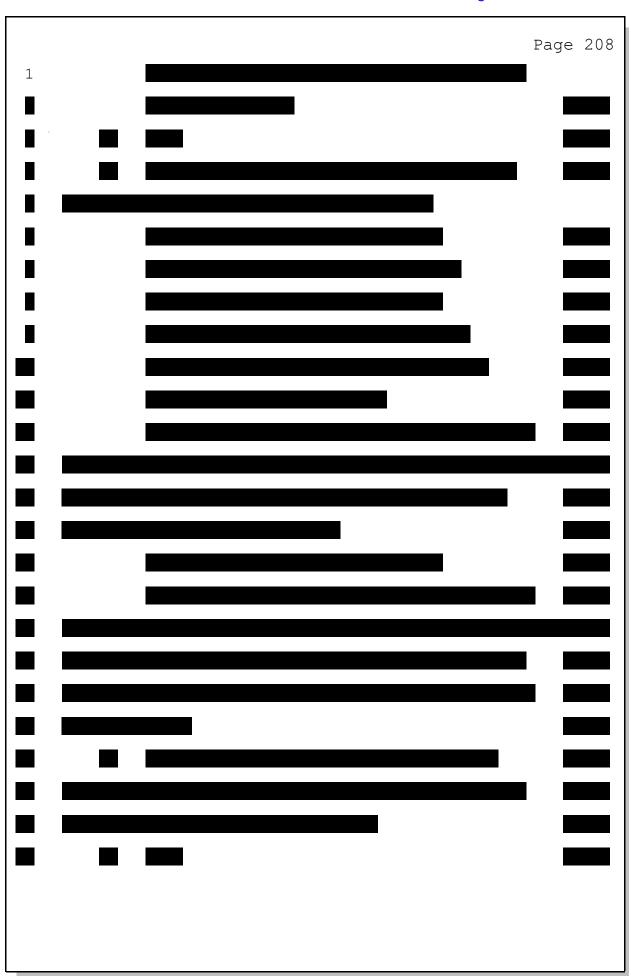


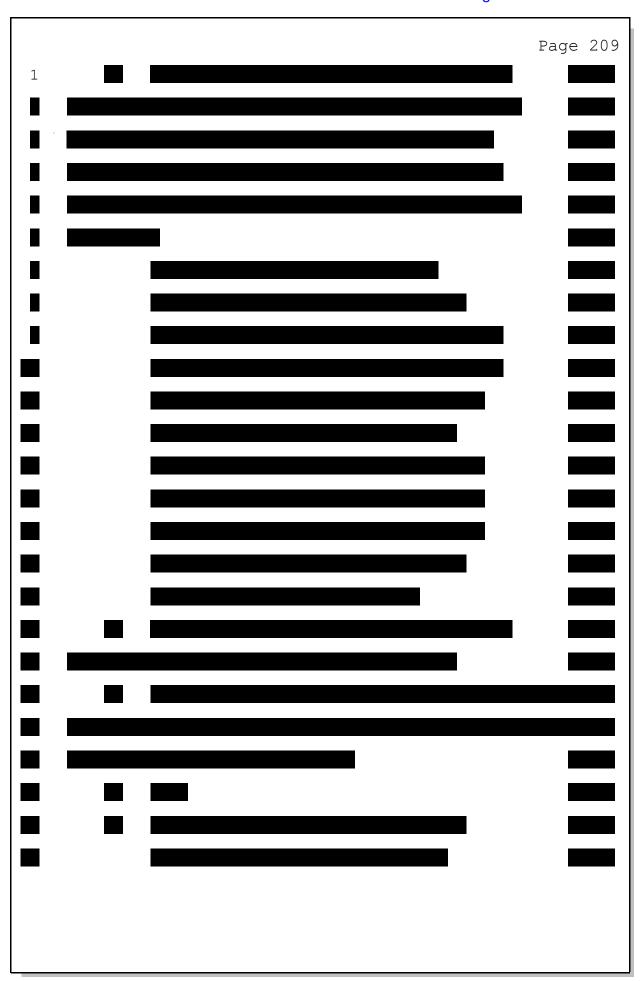


		D 205
1		Page 205
15	MR. FALCONER: Yeah. Can you go ahead	15:53
16 and fini	sh your last answer if you weren't finished	d. 15:53
17	THE WITNESS: Oh, sorry.	15 : 53
18 BY MR. I	OESER:	15:53
19 Q.	Sorry for interrupting. Go ahead.	15 : 53
_		

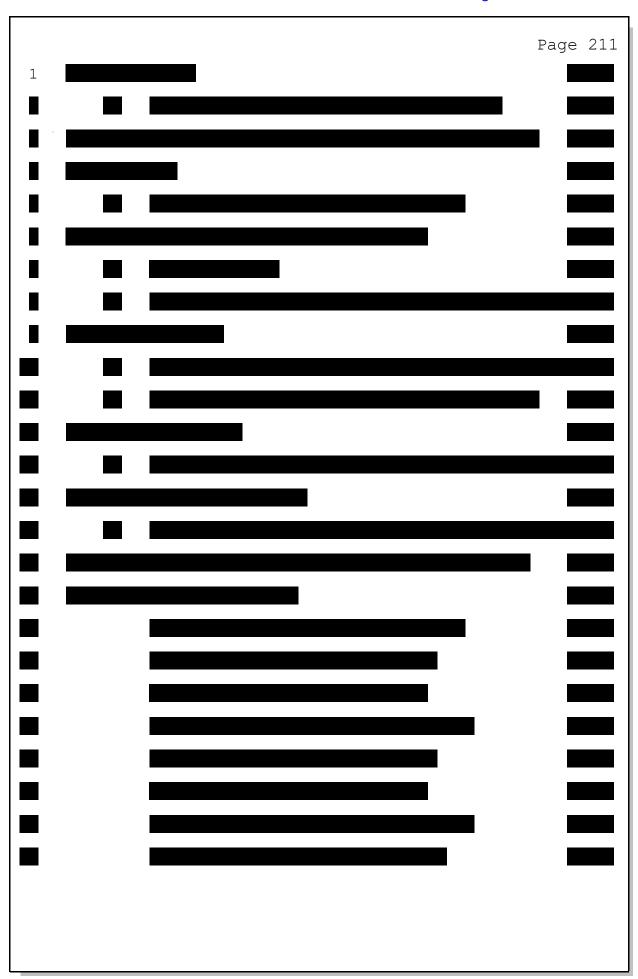


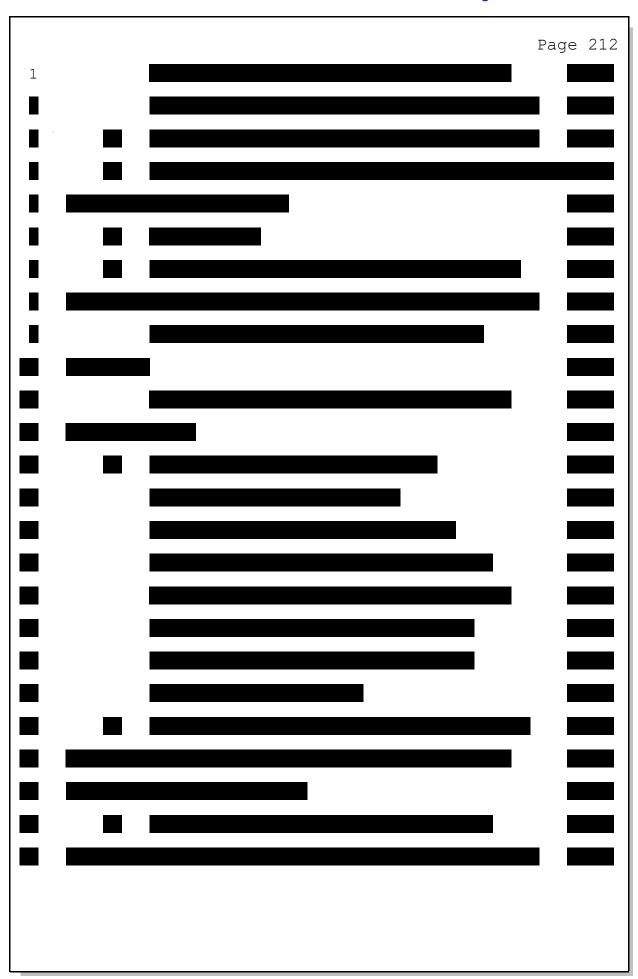
	Pa	age 207
1	very, very end of it and work through it.	15:55
2	So first, if you want to take a minute to	15 : 55
3	familiarize yourself with it, that's fine, and I	15:55
4	will ask you some specific questions that	15:55
5	A. Yes, please.	15:55
6	Q. Okay. Are you ready to answer a few	15:59
7	questions about this document?	15:59
8	A. I didn't read it fully, but sure.	15:59
9	Q. Okay. And then, I think you'll we will	15:59
10	work our way through it.	15:59
11	A. Okay.	15:59
12	Q. If you need to look at it more, that's, of	15:59
13	course, fine.	15:59

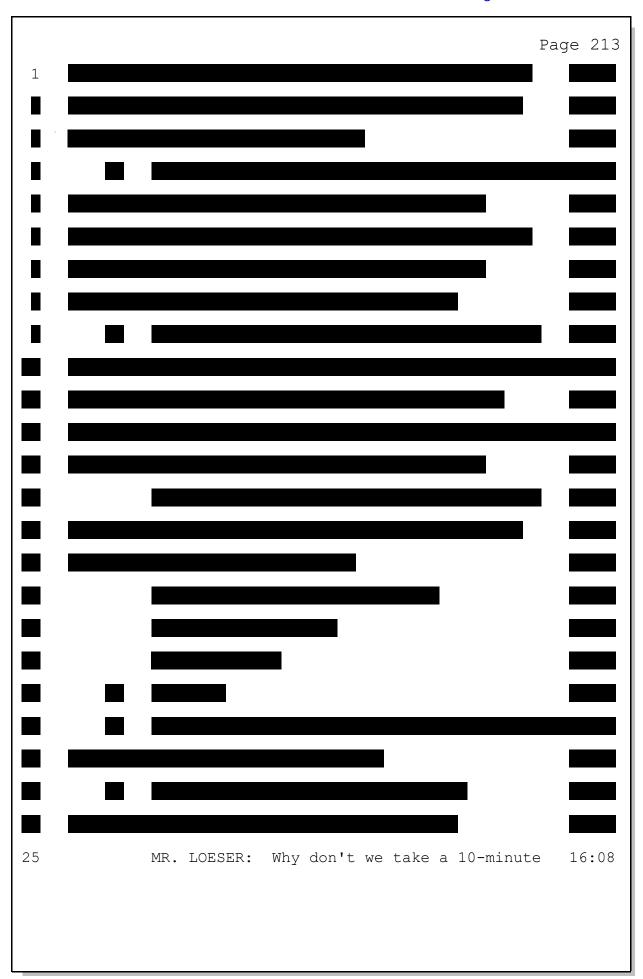




Page 210 1







	Pag	ge 214
1	break.	16:08
2	THE VIDEOGRAPHER: This marks this marks	16:08
3	the end of media No. 4 in the deposition of Jackie	16:08
4	Chang. Going off the record. The time is 4:08.	16:08
5	(Off the record.)	16:08
6	THE VIDEOGRAPHER: This marks the beginning	16:22
7	of media No. 5 in the deposition of Jackie Chang.	16:22
8	We are back on the record. The time is 4:22.	16:22
9	BY MR. LOESER:	16:22
10	Q. Miss Chang, we've talked a lot about the	16:22
11	planning for the rollout of Platform 3, and I want	16:22
12	to make sure the record is clear on what happened in	16:23
13	that planning and after the rollout.	16:23
14	As we saw in the materials we went through,	16:23
15	the new Platform 3 deprecated friends permissions	16:23
16	and read permissions; is that right?	16:23
17	A. Sorry. What are you referencing to? Or am	16:23
18	I supposed to look at a document?	16:23
19	Q. No, you don't need to look at a document. I	16:23
20	just we have been through the documents. I just	16:23
21	want to make sure it's clear to the clear on the	16:23
22	record that those documents showed that with	16:23
23	Platform 3, friends permissions and read permissions	16:23
24	were deprecated; right?	16:23
25	A. Again, I don't know specifically so whatever	16:23

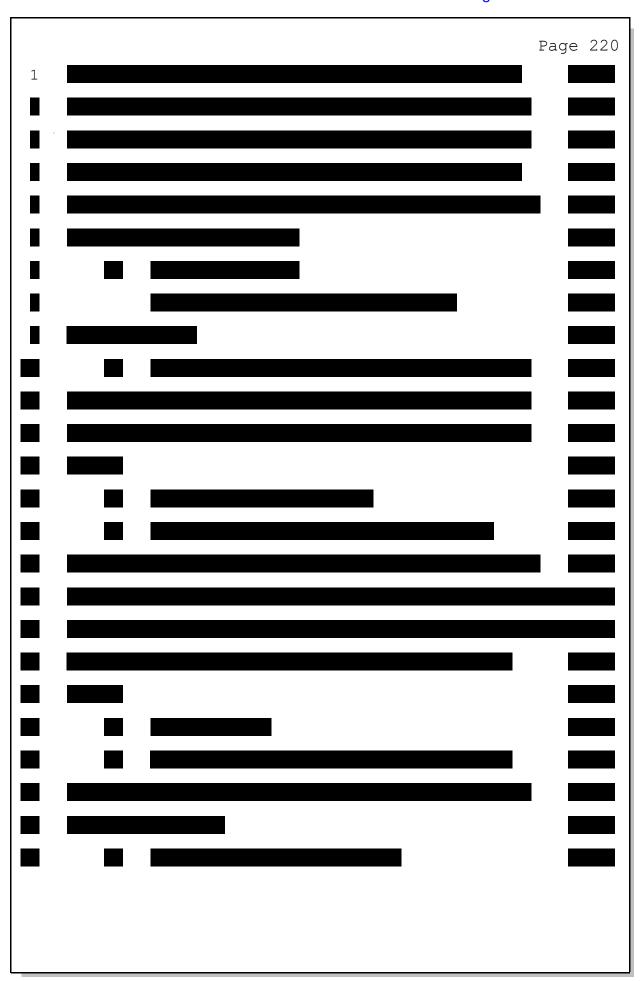
		Page 215
1	was reflected in the document.	16:23
2		
9	BY MR. LOESER:	16:24
10	Q. But you could say generally that these	16:24
12	friends and read permissions were deprecated? A. Again, I don't feel comfortable because I	16:24 16:24
13	don't remember.	16:24
14		

		Page 216
1.0		1.0.05
19 20	Q. Who would know that? A. I don't I don't know.	16:25 16:25
21	Q. Okay. You have no idea?	16:25
22	A. Not for an individual person, no.	16:25
23	Q. And so in your work now with academic	16:25
24	partnerships, if you wanted to figure out if an	
25	academic partner had continued access to friends	16:25

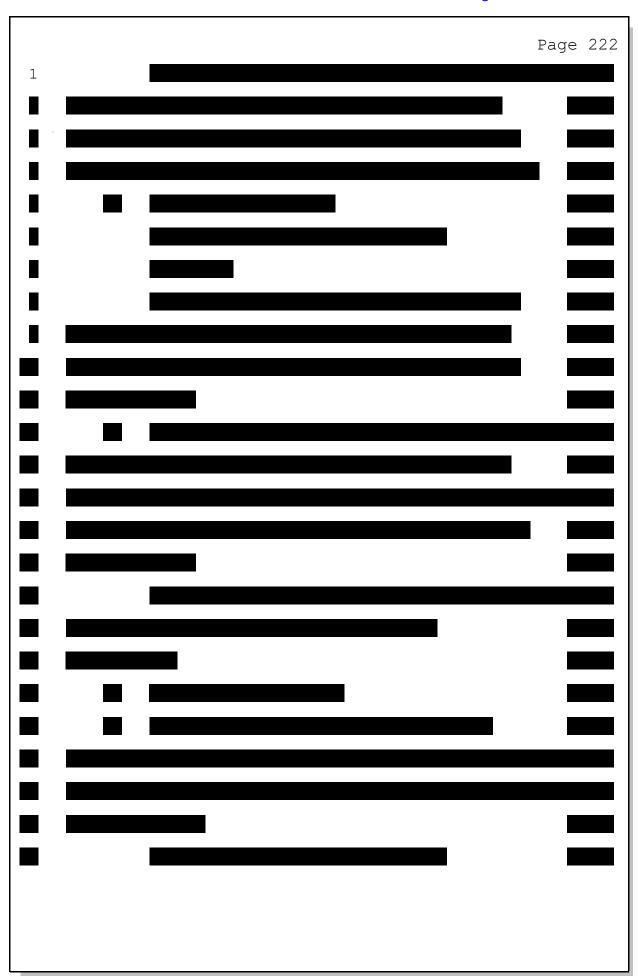
	Pa	ge 217
1	permissions, for example, who would you go ask to	16:25
2	find that out?	16:25
3	A. That's not possible.	16:25
4	Q. It's not possible for an academic researcher	16:25
5	to have access to friends permissions?	16:26
6	A. No. We don't offer that through the	16:26
7	researcher API.	16:26
8	Q. And when you were working with other types	16:26
9	of partners, if you wanted to find out if that	16:26
10	partner had access to friends permissions, do you	16:26
11	have any recollection at all as to who you would go	16:26
12	to to find that out?	16:26
13	A. I don't know I don't know specifically	16:26
14	off the top of my head. I don't know, but I	16:26
15	don't yeah.	16:26
16	Q. So, again, I want to make sure I understand	16:26
17	and use the right terminology. If a developer or	16:26
18	partner continued to have access to deprecated	16:26
19	permissions, does that by definition mean that the	16:26
20	app or partner was whitelisted?	16:26
21	A. Say that again, please.	16:26
22	Q. If a developer or partner continued to have	16:26
23	access to deprecated permissions after Platform 3	16:26
24	was implemented, does that by definition mean that	16:26
25	the app or partner was whitelisted?	16:27

	Pa	ge 218
1	MR. FALCONER: Objection. Form.	16:27
2	THE WITNESS: I don't know.	16:27
3	MR. FALCONER: Go ahead.	16:27
4	THE WITNESS: Sorry. I don't know in	16:27
5	specificity in terms of like what you're referring	16:27
6	to, meaning the technical language, I don't know. I	16:27
7	don't know if it's a whitelist. I don't know.	16:27
8	BY MR. LOESER:	16:27
9	Q. Okay. Do you know if whitelisting is one	16:27
10	way the developer or partner continue to have access	16:27
11	to deprecated permissions, but that there are other	16:27
12	ways as well?	16:27
13	A. I don't know.	16:27
14	Q. And is it your understanding that a partner	16:27
15	that has a private API, and through that private API	16:27
16	gets access to friends permission, is that	16:27
17	considered a whitelist, or is that something	16:27
18	different?	16:27
19	A. So, again, I don't I don't remember or	16:27
20	know what that would be.	16:27
21	Q. Okay. Do you know if Facebook whitelisted	16:28
22	certain app developers so that they had continued	16:28
23	access to friends permissions after Platform 3 was	16:28
24	implemented?	16:28
25	A. So, again, I don't remember it so I don't	16:28

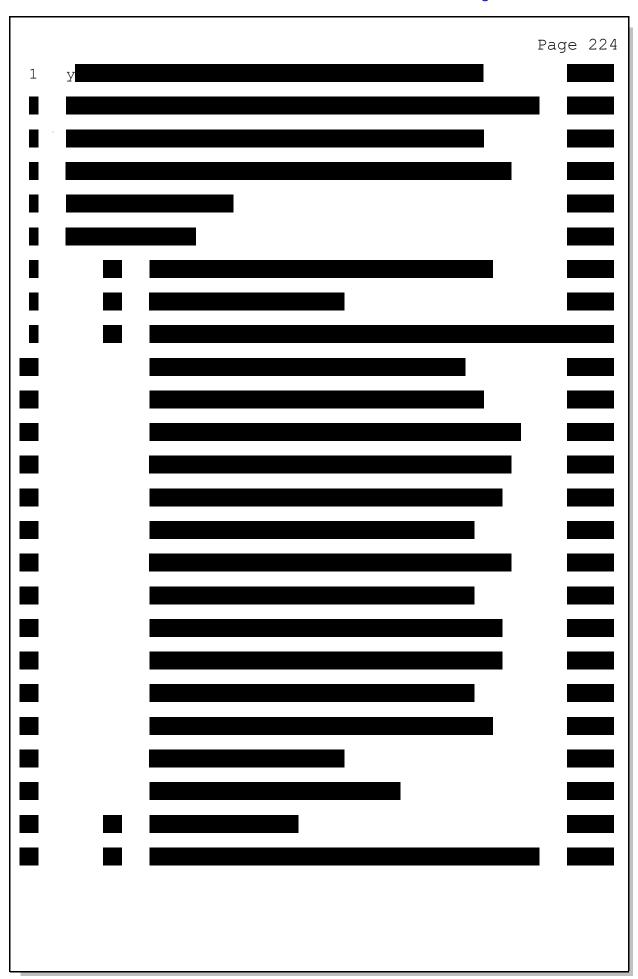
	· ·	Page 219
1	know if it could be classified as whitelist.	16:28
2	Q. The term "whitelist" is not one you have	16:28
3	used so frequently that you remember to this day	16:28
4	what it means?	16:28
5	A. No.	16:28
6	Q. Do you have any idea of the process that's	16:28
7	used to determine if an app developer or partner is	16:28
8	whitelisted so that they have continued access to	16:28
9	friends permissions?	16:28
10	A. Yeah. I don't recall it.	16:28
11	Q. Do you know if Facebook keeps records of	16:28
12	whitelisted developers/partners?	16:28
13	A. I don't know.	16:28
14	Q. You have no recollection at all as to	16:28
15	whether that information is collected and maintained	d 16:29
16	in one place so that someone could easily find out	16:29
17	who are all of the whitelisted partners or	16:29
18	developers?	16:29
19	A. So again	16:29
20	MR. FALCONER: Asked and answered.	16:29
21	THE WITNESS: that's outside my scope,	so 16:29
22	I don't know.	16:29
23	BY MR. LOESER:	16:29
24		



		ge 221
1	MR. FALCONER: Derek, you're on mute. I	16:32
2	don't know if you did that on purpose.	16:32
3	MR. LOESER: I did not do that on purpose.	16:32
4	BY MR. LOESER:	16:32
5	Q. So if we can go back to Exhibit 8.	16:32
6	DEPOSITION REPORTER: Excuse me, Counsel,	
7	which exhibit?	
8	MR. LOESER: This is Exhibit 8. This is an	16:32
9	Excel file.	16:32
10	BY MR. LOESER:	
11		
1		



	Pag	ge 223
1		
3	BY MR. LOESER:	16:34
4	Q. Did you have any interaction with a partner	16:35
5	in a discussion of the information the	16:35
6	permissions the partner was interested in, where	16:35
7	they said to you, Hey, we want to arrange so that we	16:35
8	have permission to access friends_video?	16:35
9	A. I don't remember specifically like	16:35
10	individual permissions.	16:35
11	Q. Okay. Do you remember any conversations at	16:35
12	all about friends permissions with any partner?	16:35
13	A. I don't remember specifically anything about	16:35
14	friends permission.	16:35
15	Q. Do you remember anything generally about	16:35
16	friends permissions? And particularly, I'm asking	16:35
17	if any partner that you have worked with raised that	16:35
18	as a permission that they were interested in gaining	16:35
19	access to.	16:35
20	A. I don't I don't I don't recall.	16:35
21	MR. LOESER: Okay. We can go to Exhibit 21.	16:36
22	(Exhibit 20 marked for identification.)	16:36
23	MR. LOESER: Oh, is it 20? Yeah.	16:36
24	While that's being loaded, for the record,	16:36
25	this is an email from Simon Cross to, among others,	16:36



3 Q. Do you recall it at all?	5:38 5:38 5:38
3 Q. Do you recall it at all?	5:38
4 A. No, I don't.	5:38
5 Q. And can you tell me what "app-based GKs" 16	5 : 38
6 are?	5:38
7 A. I don't know.	5:38
8 Q. You have no recollection whatsoever? 16	5:38
9 A. No. Again, I'm not I'm not the technical 16	5 : 38
10 person, so I just don't I don't know technically 16	5 : 38
11 what it would mean.	5 : 38
12 Q. Okay. Do you know what the Capabilities 16	5 : 38
13 tool was?	5 : 38
14 A. Not specifically. I've heard of it, but I 16	5 : 38
15 don't know it in detail.	5:39
16 Q. Well, what have you heard about it? 16	5:39
17 A. It looks like some sort of permissioning 16	5:39
18 tool.	5:39
19 Q. And what does that mean?	5:39
20 A. It grants permissions.	5:39
Q. Who does it grant permissions to?	5:39
22 A. So, again, I don't I don't know the 16	5:39
23 technical specifics, so I don't feel comfortable 16	5:39
24 talking about it in depth because I might 16	5:39
25 mischaracterize it. 16	5:39

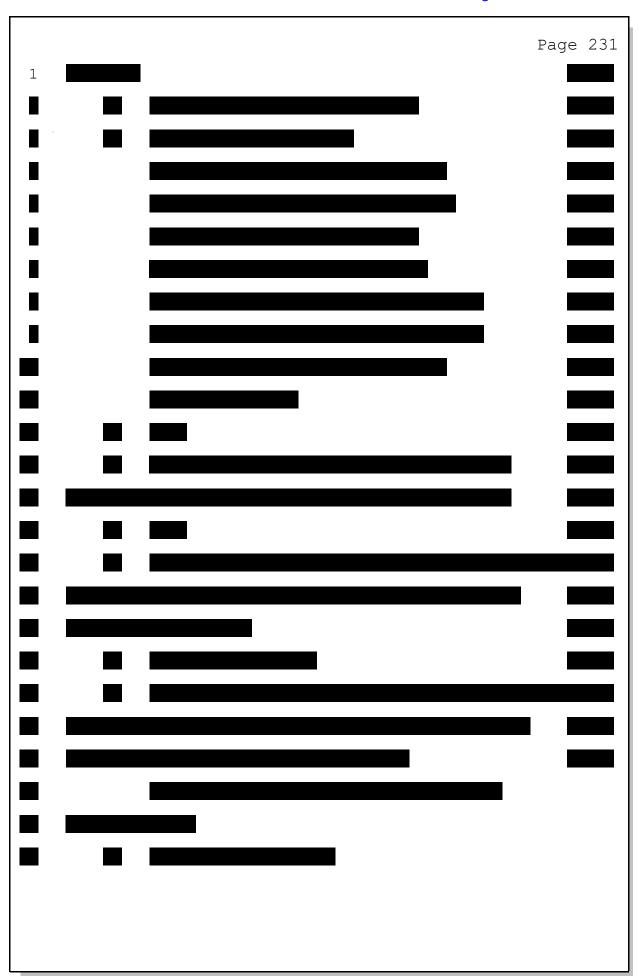
		Page 226
1	Q. Okay. You've said all that you feel	16:39
2	comfortable saying about it?	16:39
3	A. Well, like all that I know about it.	16:39
4		
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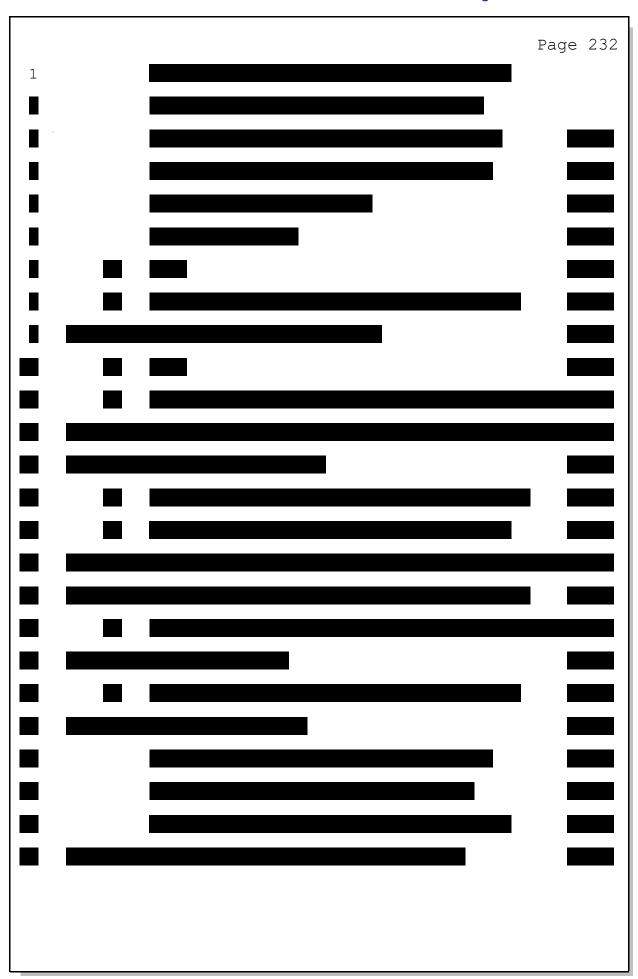
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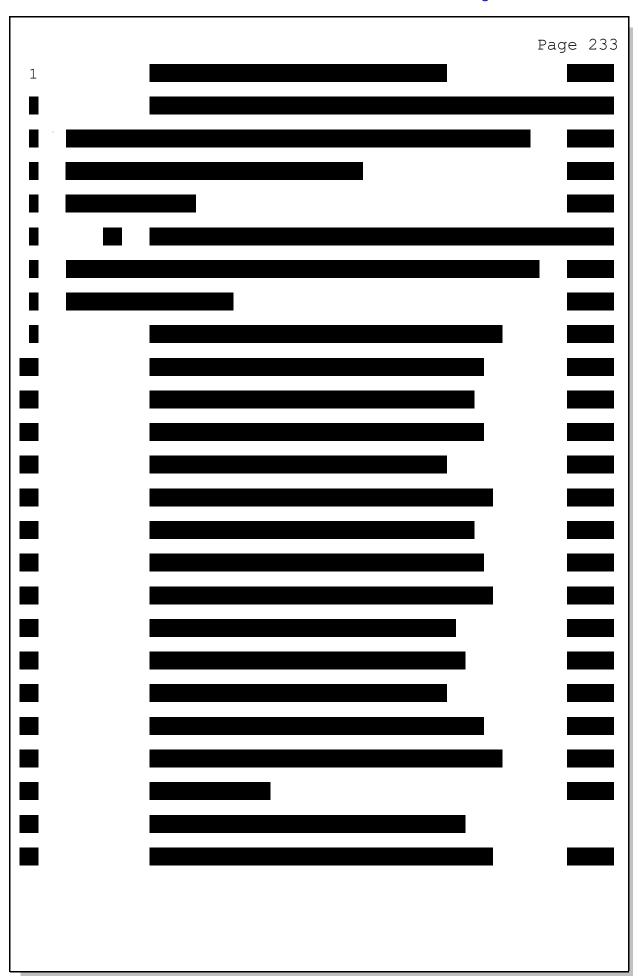
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9	BY MR.	LOESER:	16:42
10	Q.	So what was your job in October of 2013?	16:42
11	Α.	I believe it was partner manager.	16:42
12			

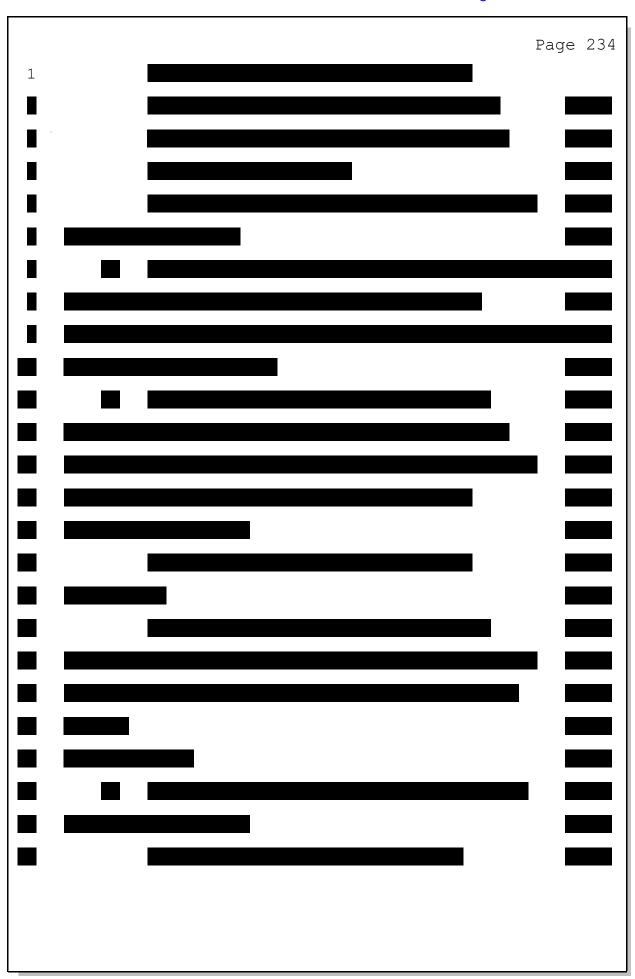
	Pa	ge 229
1		
9	Q. Now, as the partner manager, were you aware	16:44
10	of that use for capabilities?	16:44
11	A. I'm not sure I understand.	16:44
12	Q. Did you use the capabilities tool at all in	16:44
13	your position at the time?	16:44
14	A. I don't remember. There's a lot of tools,	16:44
15	so I don't remember this one specifically.	16:44
16		
22	MD IOECED. If we can go to Ewhibit 222	16:45
23	MR. LOESER: If we can go to Exhibit 22? (Exhibit 21 marked for identification.)	16:45
23	MR. FALCONER: This is Exhibit 21; right?	
25	MR. LOESER: Yeah.	16:46
25	III. LOLOLI. ICUII.	10.10

		D.	
1	ייא עכן		16:46
1	BY MR. I		
2	Q.	Miss Chang, I'm showing you Exhibit 21,	16:46
3		s an email from Paul Stepnowsky to, among	
4	others,	you. This is dated September 3rd, 2019, and	16:46
5	it conta	ains a chat message; is that right?	16:46
6	Α.	Yes, I see that.	16:46
7	Q.	And so in 2019, what was your position at	16:46
8	Faceboo!	k?	16:46
9	А.	I believe it was product partnerships.	16:46
10	Q.	Who is Paul Stepnowsky?	16:46
11	Α.	I don't remember specifically.	16:46
12	Q.	Okay. So on September 3rd of 2019, there	16:46
13	was this	s chat, and it starts with Paul Stepnowsky	16:47
14			
17		Do you first of all, is "TechCrunch" a	16:47
18	publicat	tion?	16:47
19	А.	Yes.	16:47
20	Q.	Are you familiar with that publication?	16:47
21	А.	I know what it is, yes.	16:47
22			



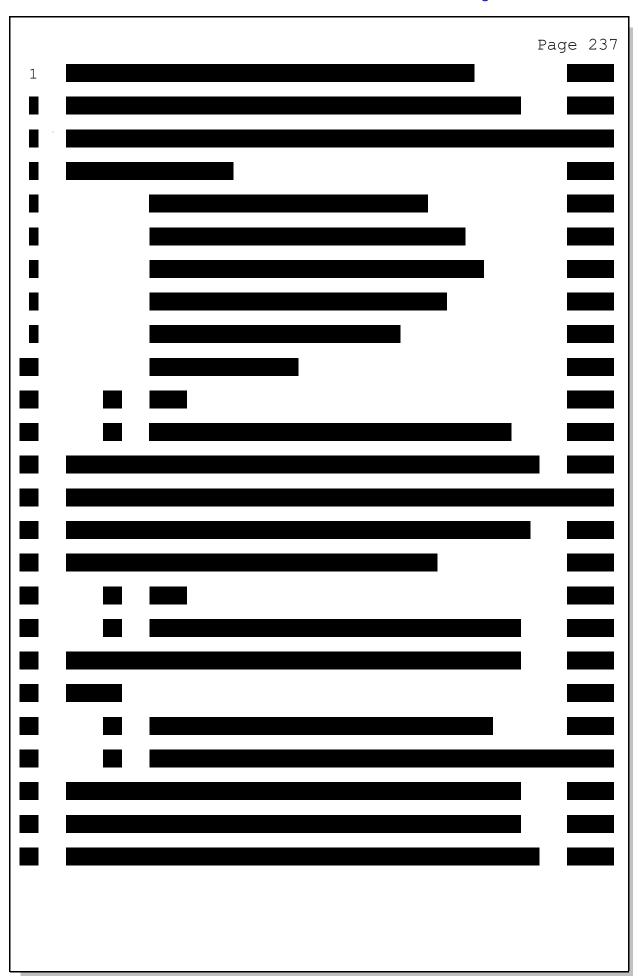


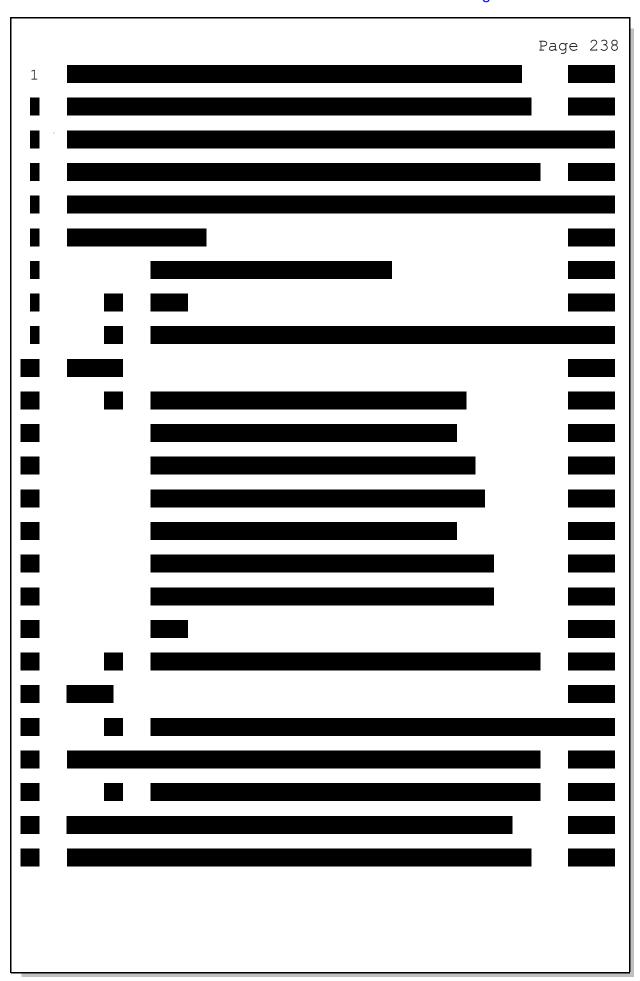


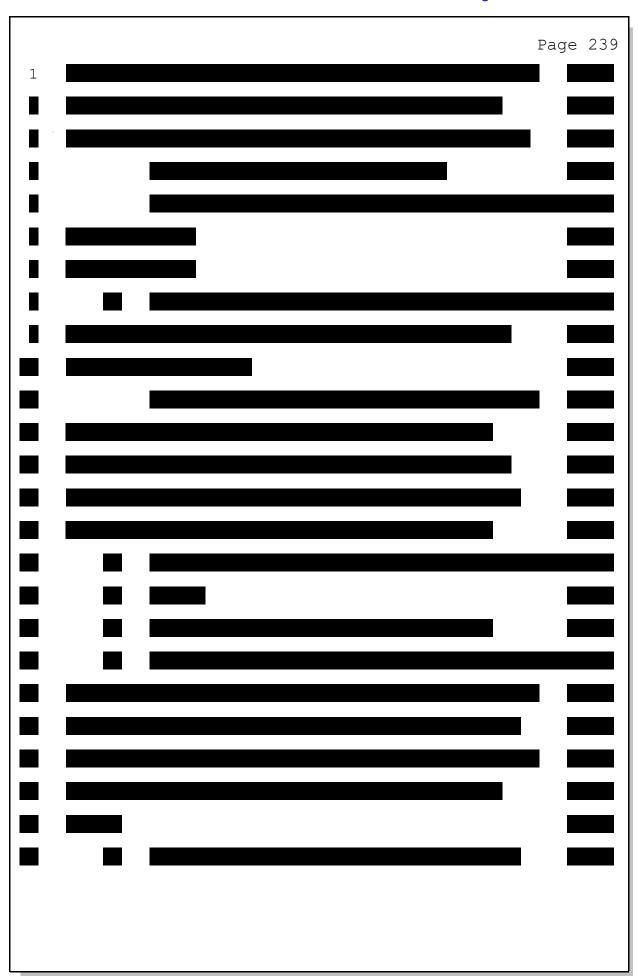


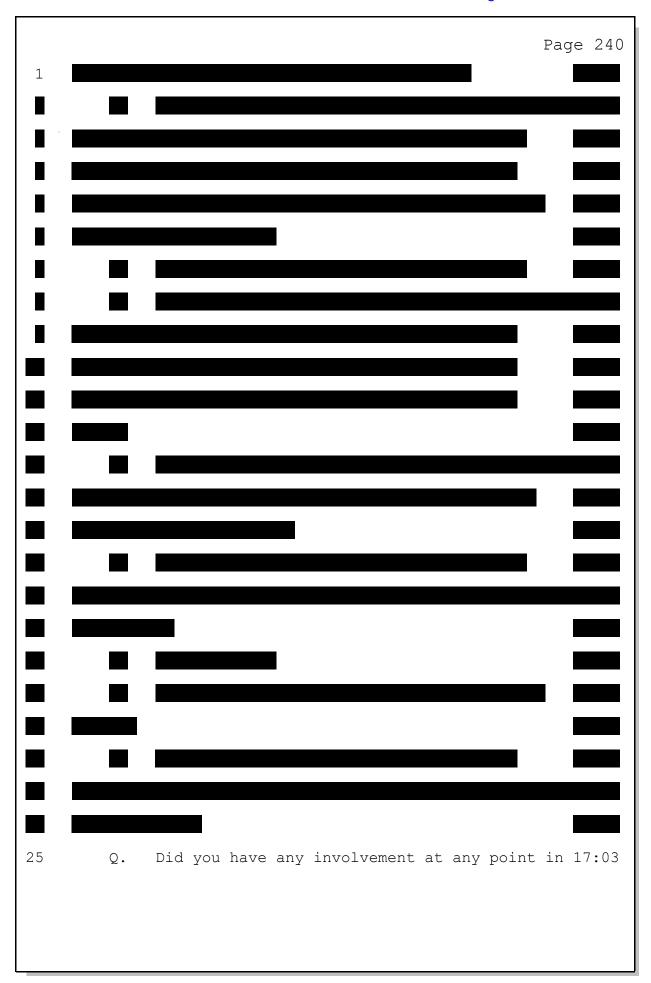
	Page 235
1	1 age 255
1	
	_ =

	Pa	ge 236
1		
5	MR. LOESER: We can go to the next exhibit.	16:54
6	This should be Exhibit 22 by my count. My tabs are	16:55
7	off now, so I will be making a lot of mistakes, I'm	16:55
8	sure.	16:55
9	MR. FALCONER: They are off by 1. It would	16:55
10	be easier if they were off by like 46.	16:55
11	(Exhibit 22 marked for identification.)	16:55
12	BY MR. LOESER:	16:55
13	Q. Miss Chang, I'm showing you what's been	16:55
14	marked Exhibit 22, which is an email from Simon	16:55
15	Cross to Eddie O'Neil, dated March 27, 2014.	16:55
16		









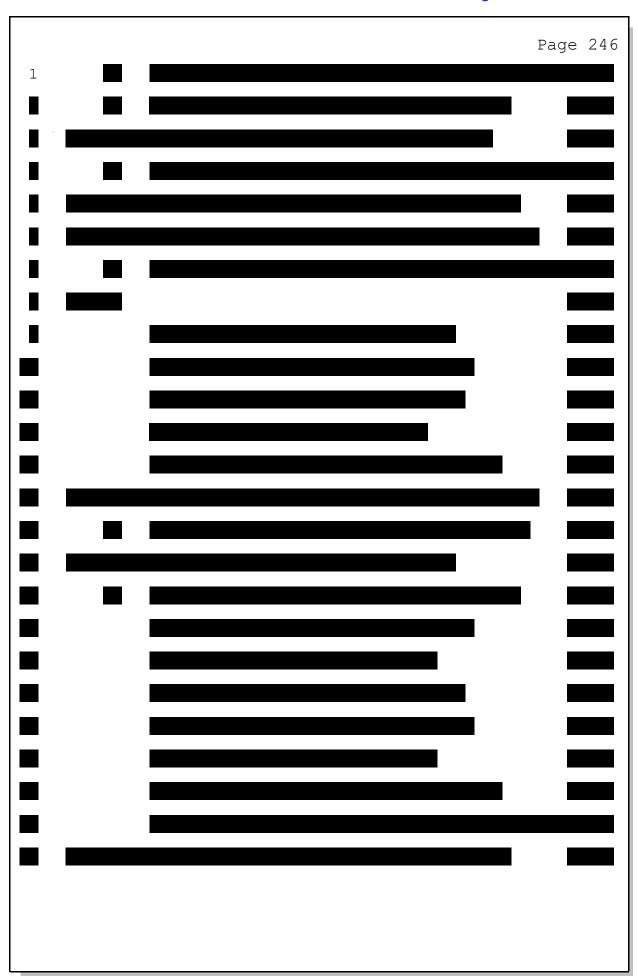
	Pa	ıge 241
1	your career at Facebook with screening third-party	17:03
2	developers before well, strike that.	17:03
3	Do you know whether Facebook screened	17:03
4	third-party developers or their apps before granting	17:03
5	them access to Graph API?	17:03
6	A. I	17:03
7	MR. FALCONER: Object to form.	17:03
8	THE WITNESS: Sorry. I don't understand.	17:03
9	Can you give me an example.	17:04
10	BY MR. LOESER:	17:04
11	Q. Sure. Let me ask again. Do you know	17:04
12	whether Facebook screens apps or developers before	17:04
13	allowing them to access the Facebook Graph?	17:04
14	MR. FALCONER: Objection. Form.	17:04
15	Go ahead.	17:04
16	THE WITNESS: So we have like a public	17:04
17	workflow that has a developer operations team that	17:04
18	reviews the apps, so I don't I don't know if	17:04
19	that's what you're referring to.	17:04
20	BY MR. LOESER:	17:04
21	Q. And do you know anything about the process	17:04
22	for reviewing apps, how that's done?	17:04
23	A. Not in detail.	17:04
24	Q. Do you know if that process changed after	17:04
25	2012?	17:04

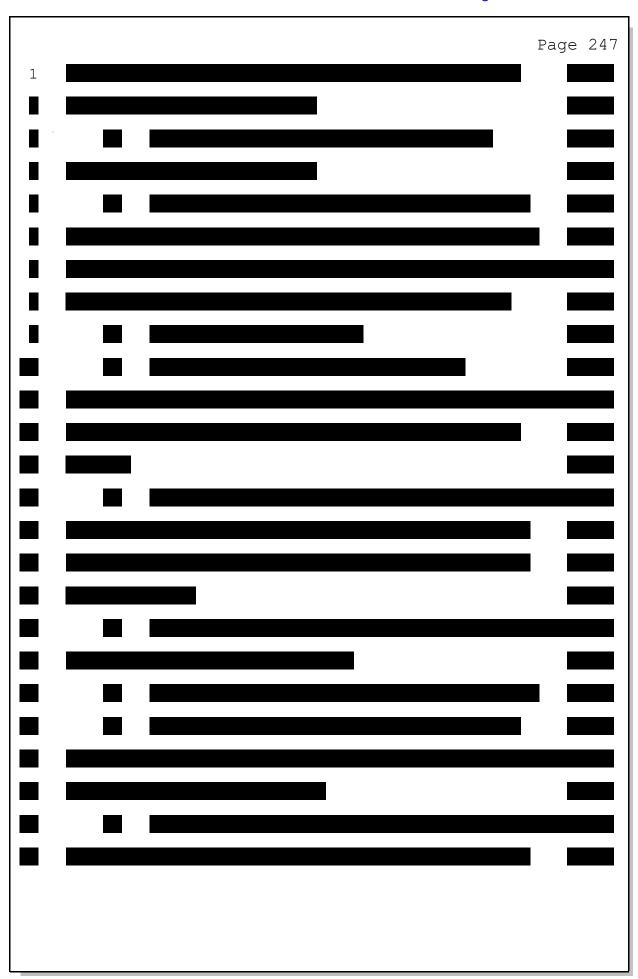
	Pag	ge 242
1	A. So I can't really speak to that process. I	17:04
2	don't know.	17:04
3	Q. Do you know if Facebook reviewed privacy	17:04
4	policies of third-party apps to ensure that they	17:05
5	complied with Facebook's own policies before	17:05
6	providing those apps access to Facebook Graph?	17:05
7	MR. FALCONER: Objection. Form.	17:05
8	THE WITNESS: Sorry. Can you say that	17:05
9	again?	17:05
10	BY MR. LOESER:	17:05
11	Q. Do you know if Facebook reviewed the privacy	17:05
12	policies of third-party apps?	17:05
13	A. I I don't know.	17:05
14	MR. FALCONER: Objection.	
15	THE WITNESS: I'm sorry.	17:05
16	MR. FALCONER: Yeah. Just same objection.	17:05
17	BY MR. LOESER:	17:05
18	Q. Are you familiar with the Facebook data use	17:05
19	policy?	17:05
20	A. Not in not not specifically. I guess	17:05
21	it's in what context?	17:05
22	Q. Well, have you ever read any version of	17:05
23	Facebook's data use policies?	17:06
24	A. So I don't remember that specifically, but	17:06
25	if you're talking about like a like a platform	17:06

	Pag	ge 243
1	usage, I mean, I know we have platform terms.	17:06
2	Q. Well, do you have you ever reviewed	17:06
3	Facebook's platform policies, platform developer	17:06
4	policies?	17:06
5	A. I mean, I have read it, but I don't remember	17:06
6	all the details of it.	17:06
7	Q. And what about the Facebook data use	17:06
8	policies specifically? Is that something you recall	17:06
9	ever reading?	17:06
10	A. I don't remember.	17:06
11	Q. During all your time working with Facebook	17:06
12	partners, did you ever become aware of any violation	17:06
13	of Facebook policies by any app developer or	17:06
14	partner?	17:06
15	A. Sorry. In what sense?	17:06
16	Q. In any sense.	17:06
17	A. I mean, I've heard that it's happened, but I	17:06
18	don't recall anything specific.	17:07
19	Q. Can you recall any specific instance of a	17:07
20	partner with whom you worked violating any Facebook	17:07
21	platform policy?	17:07
22	A. Again, I don't remember specifically but,	17:07
23	yeah, it's definitely possible.	17:07
24	Q. But you never saw it happen; is that what	17:07
25	you are saying?	17:07

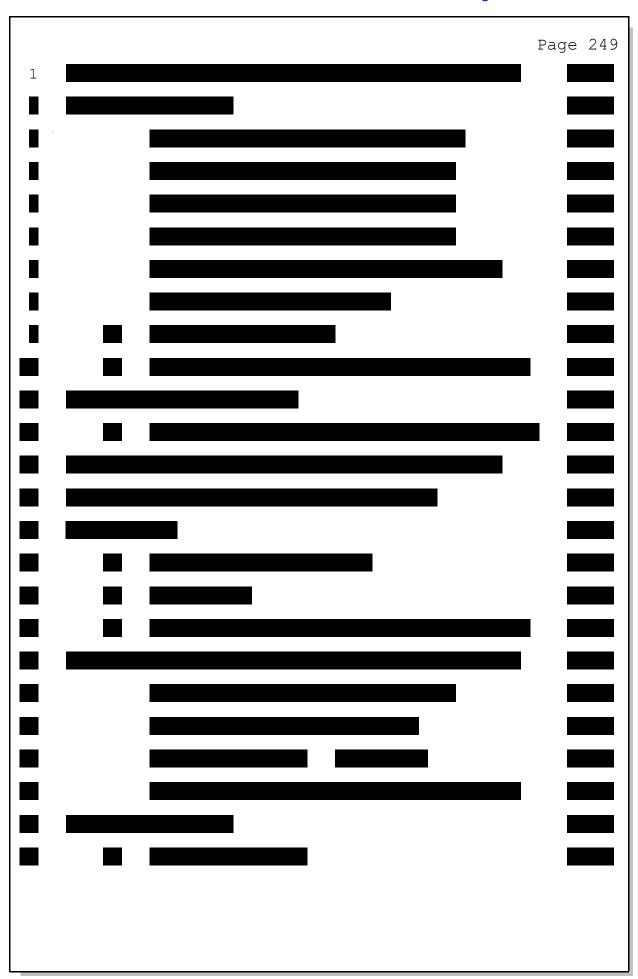
	Pag	ge 244
1	A. I don't remember. I don't remember every	17:07
2 in	stance of my interactions so I don't know.	17:07
3	Q. And there was no platform policy violation	17:07
4 of	any partner with whom you worked that you can	17:07
5 sp	ecifically recall?	17:07
6	A. Not specifically.	17:07
7	Q. Do you remember generally any platform	17:07
8 vi	olations by any of the partners with whom you	17:07
9 wc	rked?	17:07
10	A. I know that platform violations is possible,	17:07
11 bu	t I don't know specifically who or what.	17:07
12	Q. Are you aware that the data use policy has a	17:08
13 pr	ovision that states, "If an application asks	17:08
14 pe	rmission from someone else to access your	17:08
15 in	formation, the application will be allowed to use	17:08
16 th	at information only in connection with the person	17:08
17 th	at gave the permission and no one else"?	17:08
18	MR. FALCONER: Objection. Form.	17:08
19	THE WITNESS: I don't know that line	17:08
20 sp	ecifically off the top of my head. So I'll	17:08
21 as	suming if you're reading it from an actual thing,	17:08
22 ye	ah, that's	17:08
23 BY	MR. LOESER:	17:08
24	Q. And did you observe any situation in which	17:08
25 th	at specific policy I mentioned was violated by any	17:08

		Page 245
1	app or partner?	17:08
2	MR. FALCONER: Objection. Form.	17:08
3	THE WITNESS: So I don't remember.	17:08
4	MR. LOESER: It we can go to tab 25.	17:09
5	(Exhibit 23 marked for identification.)	17:09
6	BY MR. LOESER:	17:09
7	Q. Miss Chang, I'm showing you what's been	17:09
8	marked Exhibit 23, which is an email from you to	17:10
9	Eddie O'Neil, Marie Hagman and Simon Cross, dated	17:10
10		
18	And take a minute to look at your email as	nd 17:10
19	tell me if you recall what you are referring to in	17:10
20	the subject line of this email.	17:10
21	A. Sorry. I'm pulling up the document. Oka	y. 17:10
22		

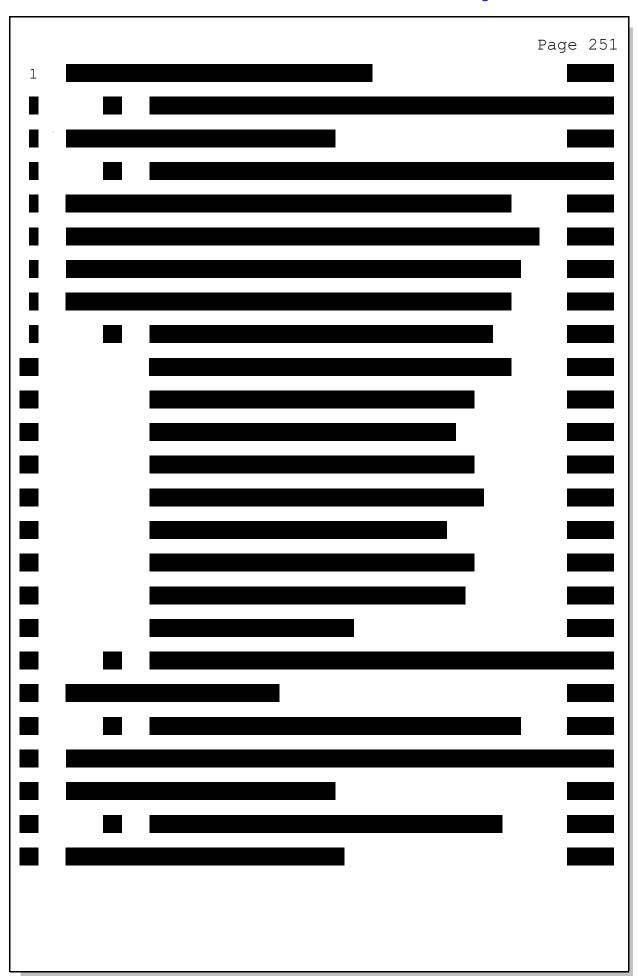


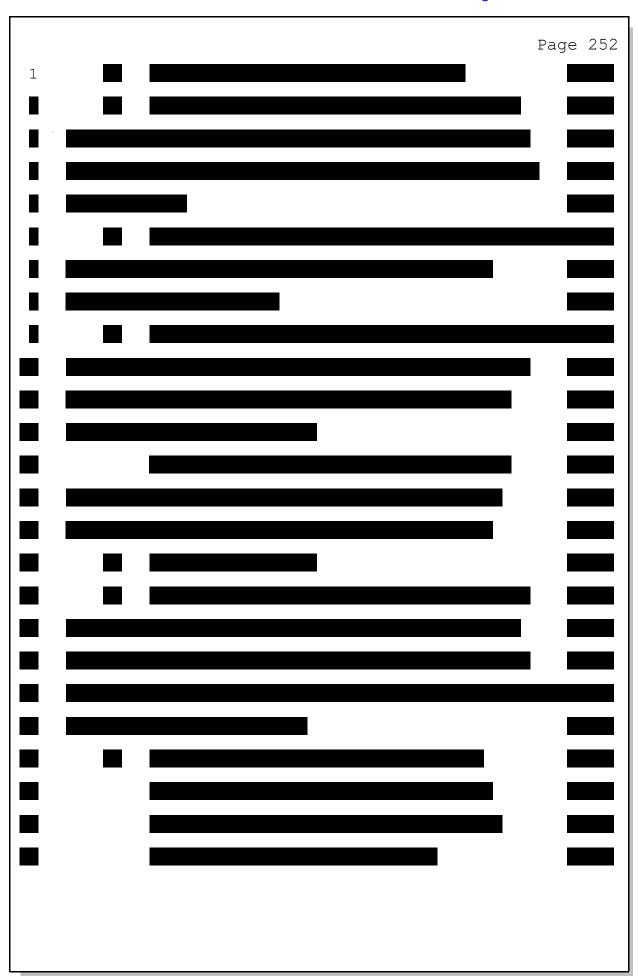


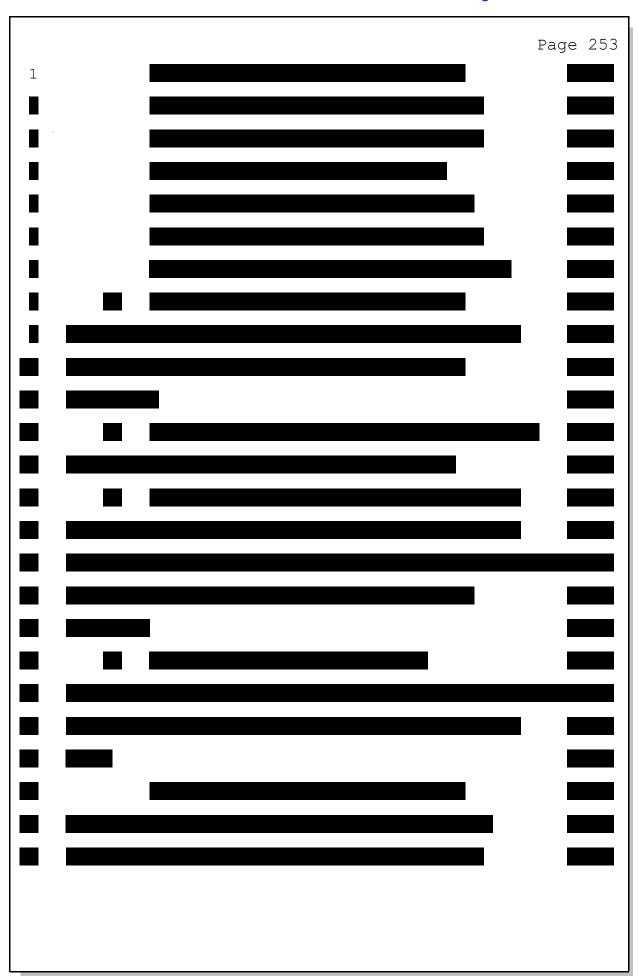
	Pag	ge 248
1	the two now.	17 : 15
2	Q. Okay. And you were very involved in tasks	17 : 15
3	relating to platform simplification; right?	17 : 15
4	A. I wouldn't assume that.	17 : 15
5	Q. You were involved enough to be responsible	17 : 15
6	for aspects of platform simplification; right?	17 : 15
7	A. I wouldn't assume that.	17 : 15
8	Q. Even for	
9	A. Being I supported I supported the work	17:15
10	stream, but I can't characterize because I don't	17 : 15
11	remember if that was my position, so that's why I	17:15
12	wouldn't assume that.	17 : 15
13	Q. But we have looked at email where you were	17:15
14	assigned a particular task with regard to platform	17:16
15	simplification; right?	17:16
16	A. So assigning to task doesn't mean I I own	17:16
17	that.	17:16
18	Q. What does it mean?	17:16
19	A. It means I'm assigned to task.	17:16
20	Q. Having been assigned the task, presumably	17:16
21	you learned something about it?	17:16
22	A. I guess. But, again, I don't know from that	17:16
23	moment in time. It's 2013, so I don't remember at	17:16
24	that moment in time.	17:16
25		

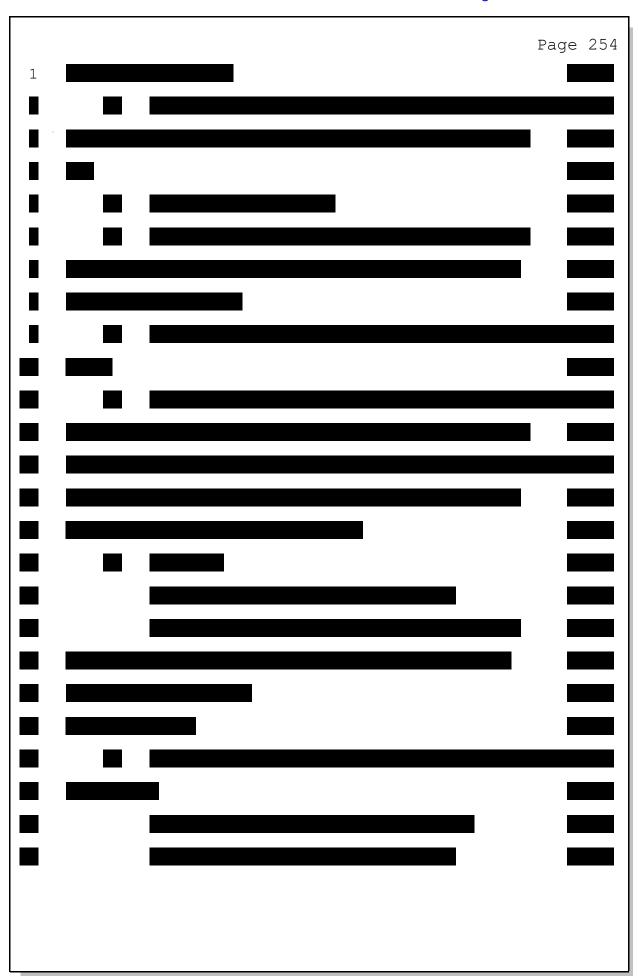


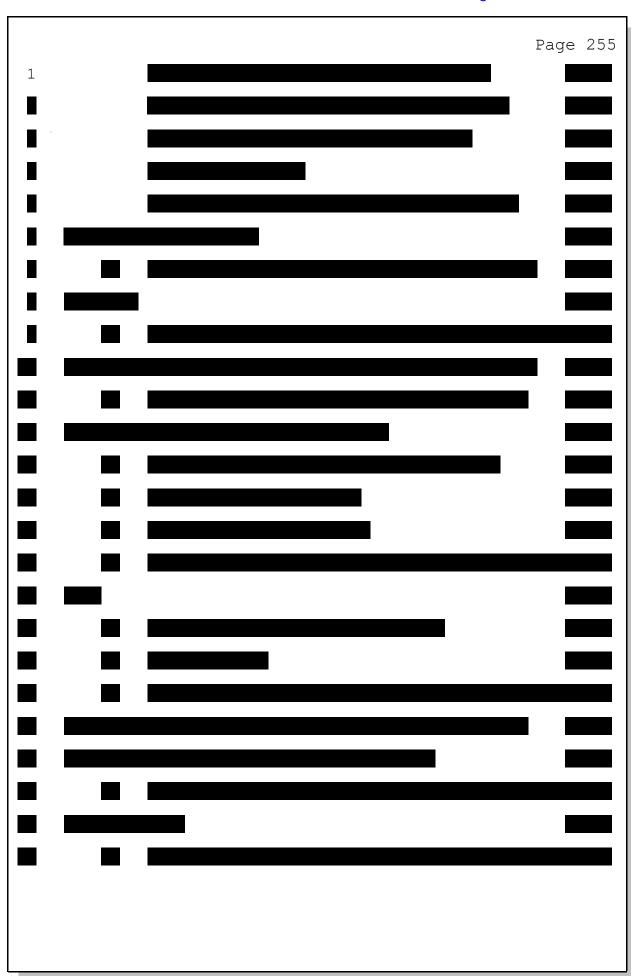
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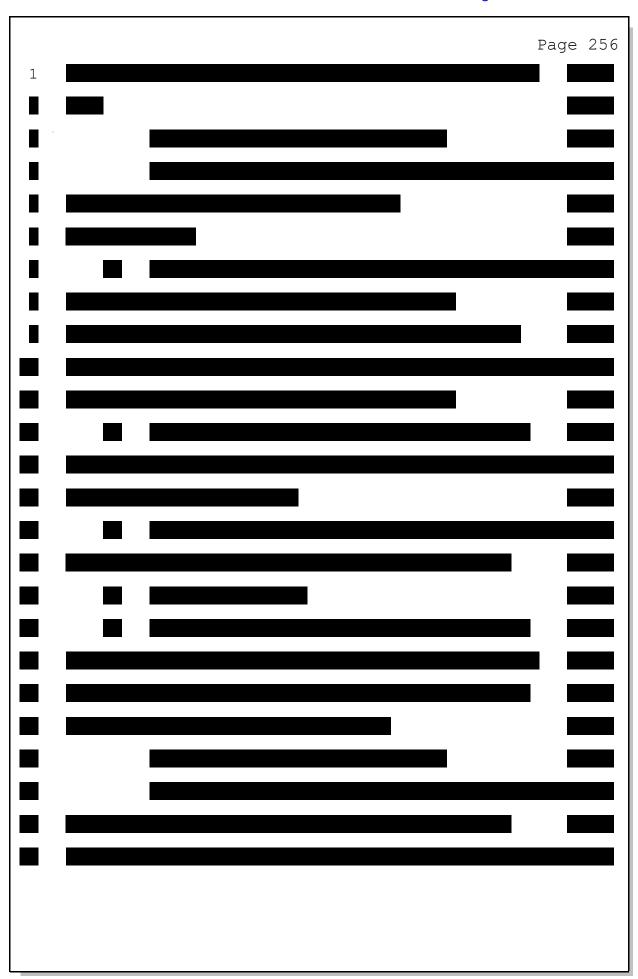


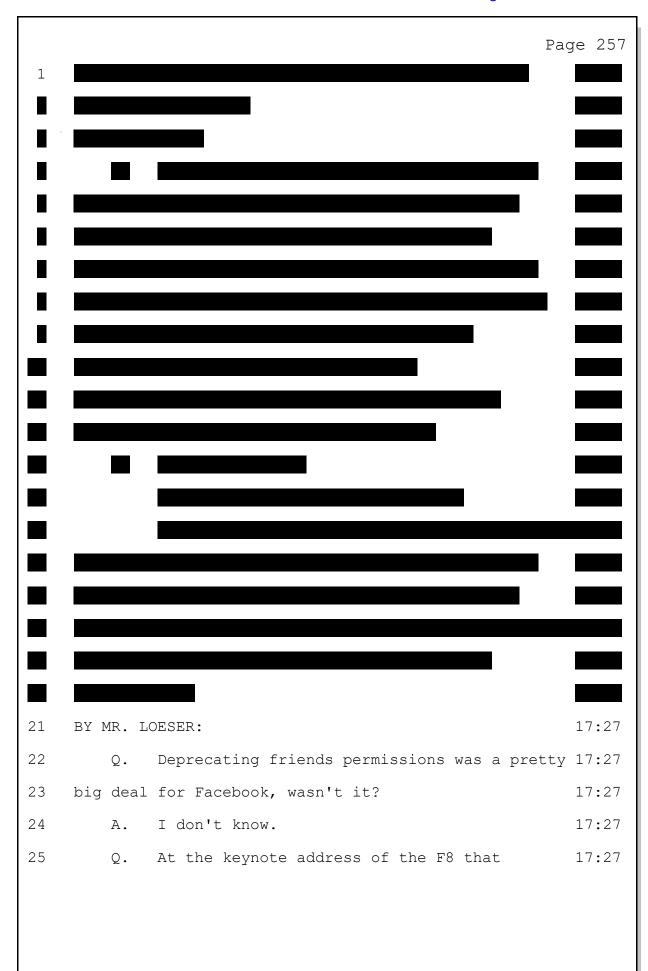












	Pac	ge 258
1	year the F8 is a big deal, isn't it?	17 : 27
2	A. The event is.	17 : 27
3	Q. Yeah. And Mark Zuckerberg gave the keynote	17 : 27
4	address in 2014; right?	17 : 27
5	A. Like we saw, yes.	17 : 27
6	Q. And that's a big deal; right?	17 : 27
7	A. I I don't know if it was back then.	17 : 27
8	Q. Okay. And in his keynote address, one of	17 : 27
9	the things he talked about was deprecating friends	17 : 27
10	permissions; right?	17 : 27
11	A. I don't know if he used those words exactly,	17 : 27
12	but whatever the video said.	17 : 27
13	Q. Okay. What the video said is that Facebook	17 : 27
14	was going to stop sharing friends data; right?	17 : 27
15	A. If that's what the video said. I don't	17 : 27
16	remember it specifically.	17 : 27
17	Q. We just watched the video, Miss Chang.	17 : 27
18	A. Right, but I didn't memorize	17 : 27
19	MR. FALCONER: Objection. Argumentative.	17 : 28
20	BY MR. LOESER:	17 : 28
21	Q. Okay. So you can't remember what	17 : 28
22	Mr. Zuckerberg said in the video clip that we showed	17 : 28
23	you a couple hours ago?	17 : 28
24	A. Not exactly.	17 : 28
25	Q. Okay. And we went through the transcript	17 : 28

	Pag	ge 259
1	A. We can play it again, I guess.	17:28
2	Q. I read the transcript to you. And in the	17 : 28
3	transcript, Mr. Zuckerberg says that Facebook was	17:28
4	going to stop letting apps access the content	17:28
5	information of a person's friends who didn't use the	17:28
6	app; right?	17 : 28
7	A. Is that an exact is that an exact	17:28
8	reading? I don't know.	17:28
9	Q. Okay. So that's all	17:28
10	A. I	
11	Q. None of that made any sense to you	17:28
12	whatsoever?	17:28
13	A. Again, I don't know if that was specifically	17:28
14	how he said, so I think you've been using things	17:28
15	interchangeably where I don't feel comfortable	17:28
16	agreeing to that. So I don't know what was exactly	17:28
17	said. I don't have the transcript in front of me to	17:28
18	be able to say that's exactly what he said.	17:28
19	Q. Well, fortunately, we have the transcript as	17:28
20	an exhibit. So why don't we go back to that	17:28
21	exhibit.	17:29
22	DEPOSITION REPORTER: Counsel, I don't think	17:29
23	you actually marked the transcript.	17:29
24	MR. LOESER: I think it is Exhibit 17.	17:29
25	DEPOSITION REPORTER: Okay. It is. You're	17:29

		Page 260
1	right. I apologize.	17 : 29
2	BY MR. LOESER:	17:29
3	Q. If you look at that second highlighted	17:29
4	paragraph. Why don't you read that again,	17:29
5	Miss Chang.	17:30
6	A. "And in the past, when one of your	17:30
7	friend"	17:30
8	Q. Go ahead. Sorry.	17:30
9	A. "And in the past, when one of your	17:30
10	friend blogged into an app, in this	17:30
11	case, Ilya, the app could ask him	17:30
12	not only to share his data, but also	17:30
13	data that his friends had shared	17:30
14	with him like photos and friend	17 : 30
15	lists here. So now we're going to	17 : 30
16	change this, and we're going to make	17 : 30
17	it so that now everyone has to choose	17:30
18	to share their own data with an app	17:30
19	themselves.	17:30
20	"So we think that this is a really	17:30
21	important step for giving people power	17:30
22	and control over how they share their	17:30
23	data with the apps. And as developers,	17:30
24	this is going to allow you to keep	17:31
25	building apps with all the same great	17:31

	Pag	ge 261
1	social features while also giving	17:31
2	people power and control first. So	17:31
3	I am really happy that we're doing	17 : 31
4	this."	17:31
5	Q. Now, I want to make sure that you understand	17:31
6	what he said here because this is something that	17:31
7	Mr. Zuckerberg included in his keynote address. And	17:31
8	as he says, he was really happy they were doing	17:31
9	this, and the "this" was eliminating friend sharing;	17:31
10	right? Is that is that a description that you	17:31
11	agree with?	17:31
12	A. No, I	17:31
13	MR. FALCONER: Object. Foundation.	17 : 31
14	THE WITNESS: No. I don't know if it's	17 : 31
15	specifically related to that. I can't assume that.	17 : 31
16	BY MR. LOESER:	17 : 31
17	Q. Okay. Let's read a sentence and see if we	17 : 31
18	can develop a common understanding.	17:31
19	"So now we're going to change this	17:31
20	and we're going to make it so that	17 : 32
21	now everyone has to choose their own	17 : 32
22	data with a" I'm sorry, "That now	17:32
23	everyone has to choose to share their	17 : 32
24	own data with an app themselves."	17 : 32
25	Do you understand what that means?	17:32

	Pa	age 262
1	A. Yes.	17 : 32
2	Q. What does that mean?	17 : 32
3	A. It means that people have to opt in to share	e 17:32
4	information. So if they publish something, they	17 : 32
5	have to opt in to do that.	17 : 32
6	Q. So that means that if one person downloads	17 : 32
7	an app, that app can't get access to that person's	17:32
8	friends, unless those friends also opt into that	17 : 32
9	sharing; is that right?	17 : 32
10	A. So I don't know specifically if it means to	17 : 32
11	that.	17 : 32
12		

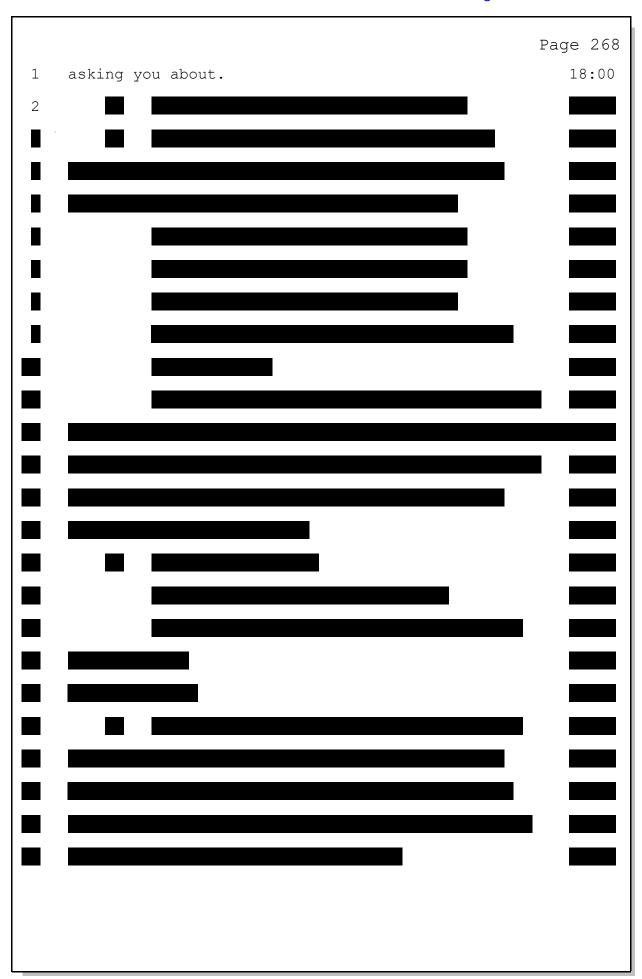
	Pao	ge 263
•		
19	Q. Well, he was specifically referring to	17:34
20	getting rid of the ability of apps to access friend	17:34
21	permissions; right?	17 : 34
22	MR. FALCONER: Objection. Form and	17:34
23	foundation.	17:34
24	THE WITNESS: I don't believe that's what he	17:34
25	said. He said:	17:34

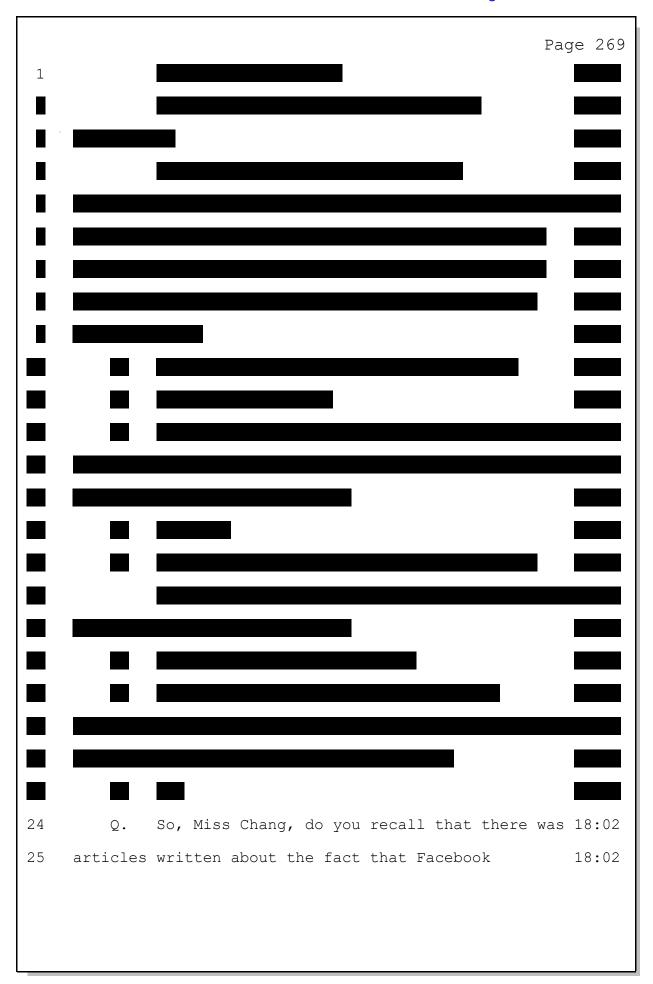
	Pag	ge 264
1	"So now we're going to change this	17:34
2	and we're going to make it so that	17:34
3	everyone has to choose to share	17:34
4	their own data with an app	17:34
5	themselves."	17:34
6	BY MR. LOESER:	17:34
7	Q. So, Miss Chang, how do you think Facebook	17:34
8	made that change? What do you think they did?	17:34
9	MR. FALCONER: Objection. Form.	17 : 34
10	THE WITNESS: They changed the permissioning	17 : 34
11	model, I'm guessing.	17 : 34
12	BY MR. LOESER:	17 : 34
13	Q. Right. Doesn't that mean that they	17 : 34
14	eliminated the friend sharing APIs? Isn't that what	17:34
15	he's saying?	17:34
16	A. I don't	17 : 34
17	MR. FALCONER: Objection to form and	17:34
18	foundation.	17 : 34
19	BY MR. LOESER:	17 : 34
20	Q. Right?	17:34
21	A. So, again, I don't know specifically because	17:34
22	I think you're referring to one thing and I don't	17 : 35
23	know.	17:35
24	Q. Okay. So looking at this language, you	17:35
25	don't draw any line between making it so everyone	17 : 35

	Pa	ge 265
1	has to choose to share their own data with an app	17 : 35
2	themselves; you draw no connection in your mind	17 : 35
3	between that and eliminating friend sharing?	17 : 35
4	A. Again, I don't know what Mark is	17 : 35
5	specifically referring to, so I can't make that	17:35
6	assumption or connection.	17:35
7	Q. And having gone through all these emails	17:35
8	that we went through and looking at this language,	17:35
9	you still can't make that connection?	17:35
10	A. I can't.	17:35
11	MR. FALCONER: Derek, we have been going a	17:35
12	little more than an hour. Whenever you hit a	17:36
13	stopping point, can we take a break?	17:36
14	MR. LOESER: Now is fine.	17 : 36
15	THE VIDEOGRAPHER: This marks the end of	17:36
16	media No. 5 in the deposition of Jackie Chang.	17:36
17	Going off the record. The time is 5:36.	17 : 36
18	(Off the record.)	17:36
19	THE VIDEOGRAPHER: This marks the beginning	17:56
20	of media No. 6 in the deposition of Jackie Chang.	17:56
21	We are back on the record. The time is 5:57.	17:57
22	BY MR. LOESER:	17:57
23	Q. Miss Chang, before we were talking about the	17:57
24	2014 F8 Conference and I want to make sure I	17:57
25	understand your testimony. Do you generally attend	17:57

	Pag	ge 266
1	the F8 Conferences?	17 : 57
2	A. Not generally. I've been to them, but I	17:57
3	haven't been to all.	17 : 57
4	Q. And do you generally just don't have much	17 : 57
5	of a role there, so you can't remember much about	17 : 57
6	it?	17 : 57
7	A. That depends on which F8. I've spoken at F8	17 : 57
8	before.	17 : 57
9	Q. What are the topics on which you've spoken?	17 : 57
10	A. On Internet.org.	17 : 57
11	Q. Okay. And what year? Do you recall what	17 : 57
12	year that was?	17 : 57
13	A. I don't remember what year exactly.	17 : 57
14	MR. LOESER: We're going to show you the	17 : 57
15	next exhibit, which should be I know I'm going to	17 : 57
16	say it wrong, but I think it is Exhibit 24.	17 : 57
17	(Exhibit 24 marked for identification.)	17 : 58
18	BY MR. LOESER:	17 : 58
19	Q. Miss Chang, you should be looking at	17 : 58
20	Exhibit 24, which is an email from KP to Simon	17 : 58
21		
23	Do you see that?	17 : 58
24	A. Yes. Can I read it?	17 : 58
25	Q. I'm just going to ask you just about one	17 : 58

Pa	ge 267
sentence. So why don't we go to that and then if	17:59
you need more context to understand it, then, by all	17 : 59
means, take your time, but	17 : 59
A. Okay.	17:59
MR. FALCONER: Objection. Form.	17 : 59
THE WITNESS: Can I read this document	17 : 59
first?	17 : 59
BY MR. LOESER:	17:59
Q. Yes, please. Well, that's the only	17:59
that's the only section I want to ask you about, so	17:59
if you want to just look at that, I will give you a	17:59
second. We could speed this up.	17:59
A. Okay.	17:59
Q. But look go ahead and look and see what	17:59
this what this email is and familiarize yourself	18:00
with it. That's the only part I am going to be	18:00
	means, take your time, but A. Okay. MR. FALCONER: Objection. Form. THE WITNESS: Can I read this document first? BY MR. LOESER: Q. Yes, please. Well, that's the only that's the only section I want to ask you about, so if you want to just look at that, I will give you a second. We could speed this up. A. Okay. Q. But look go ahead and look and see what this what this email is and familiarize yourself





	Pag	ge 270
1	partners continued to have access to friends data	18:02
2	after the implementation of Graph API version 2?	18:03
3	A. No. I don't know what articles you're	18:03
4	referencing to.	18:03
5	MR. LOESER: Let's go to the next exhibit.	18:03
6	(Exhibit 25 marked for identification.)	18:03
7	BY MR. LOESER:	18:03
8	Q. And this is Exhibit 25. Miss Chang, this is	18:03
9	a New York Times article from December 16th of	18:03
10	June 3rd, 2018. "Facebook Gave Device Makers Deep	18:04
11	Access to Data on Users and Friends."	18:04
12	Do you recall when this article came out?	18:04
13	A. No.	18:04
14	Q. And would it be your normal course to find	18:04
15	out if an article was written about an area that	18:04
16	concerned work that you did at Facebook?	18:04
17	A. No. I think I would be reading articles for	18:04
18	a very long time, so I don't focus a lot on	18:04
19	articles. That would be our communications team.	18:04
20	Q. Okay. So when this article and the	18:04
21	subheading is:	18:04
22	"The company formed data-sharing	18:04
23	partnerships with Apple, Samsung and	18:04
24	dozens of other device makers,	18:04
25	raising new concerns about its privacy	18:04

	Pa	ige 271
1	protections."	18:04
2	As we saw in the email, you were very	18:04
3	involved in the partnerships and the providing of	18:04
4	extended access to deprecated permissions.	18:04
5	But no one sent this to you and said, hey,	18:04
6	weren't you involved in this?	18:05
7	A. No.	18:05
8	MR. FALCONER: Objection. Form.	18:05
9	BY MR. LOESER:	18:05
10	Q. You've never read this article?	18:05
11	A. No.	18:05
12	Q. And you've never communicated with anyone	18:05
13	about the scandal that surfaced when people figured	18:05
14	out that this had happened?	18:05
15	A. So I don't I don't know.	18:05
16	Q. So now, it's not news to you that Facebook	18:05
17	reached data-sharing partnerships with at least 60	18:05
18	device makers; right? That was work you were doing	18:05
19	at Facebook, wasn't it?	18:05
20	A. No. Specifically, I didn't work in that	18:05
21	on devices.	18:05
22		

	Pa	ge 272
1	not an article that anyone brought to your	18:05
2	attention?	18:05
3	A. I don't remember and, again, I didn't work	18:05
4	on devices.	18:06
5	Q. So this is you're learning for the first	18:06
6	time as we talk right now that there was a scandal	18:06
7	regarding Facebook continuing to provide friends	18:06
8	data to various partners?	18:06
9	A. Again, I don't remember.	18:06
10	Q. A front-page New York Times article was not	18:06
11	something that came to your attention at Facebook?	18:06
12	A. There's been many, so I don't remember this	18:06
13	specific one.	18:06
14	Q. The scandals are so many that the scandal	18:06
15	with which you were personally involved doesn't	18:06
16	stand out for you?	18:06
17	MR. FALCONER: Objection	18:06
18	THE WITNESS: I would not classify it that	18:06
19	way.	18:06
20	MR. FALCONER: form, foundation and it	18:06
21	misstates prior testimony.	18:06
22	BY MR. LOESER:	18:06
23	Q. I'm sorry. You can answer.	18:06
24	A. I would not state it the way you did.	18:06
25	MR. LOESER: All right. We can go to the	18:06

		Page 273
1	next exhibit, 26.	18:06
2	(Exhibit 26 marked for identification.)	18:06
3	BY MR. LOESER:	18:07
4	Q. Miss Chang, we're showing you Exhibit 26,	18:07
5	which is an email from Charlotte Edelson to several	18:07
6	people, including yourself, dated August 28th, 2014	: 18:07
7		
12	Q. Do you know who Charlotte Edelson is?	18:08
13	A. No, I don't I don't remember.	18:08
14		

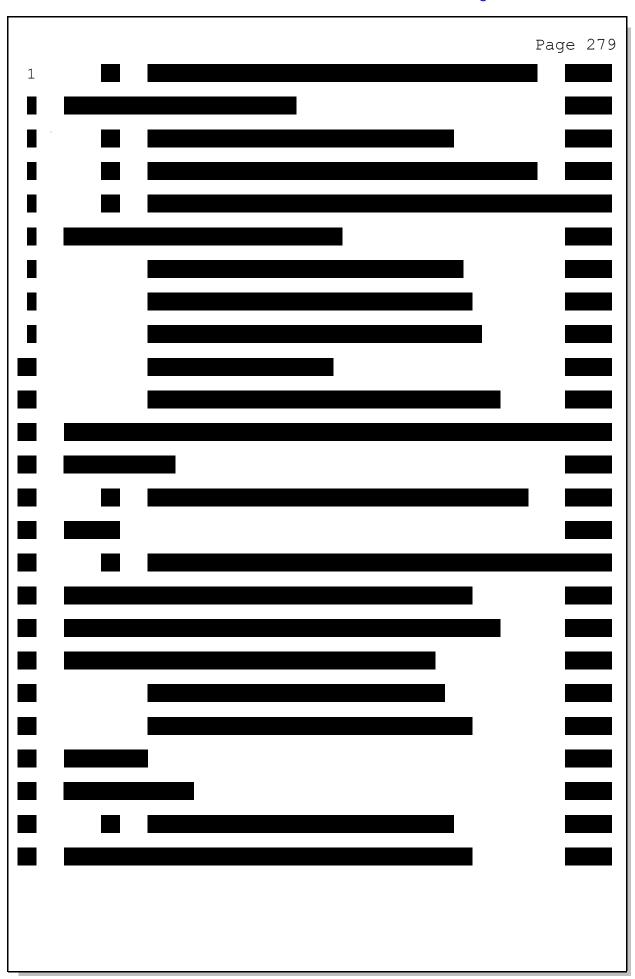
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	Page 278
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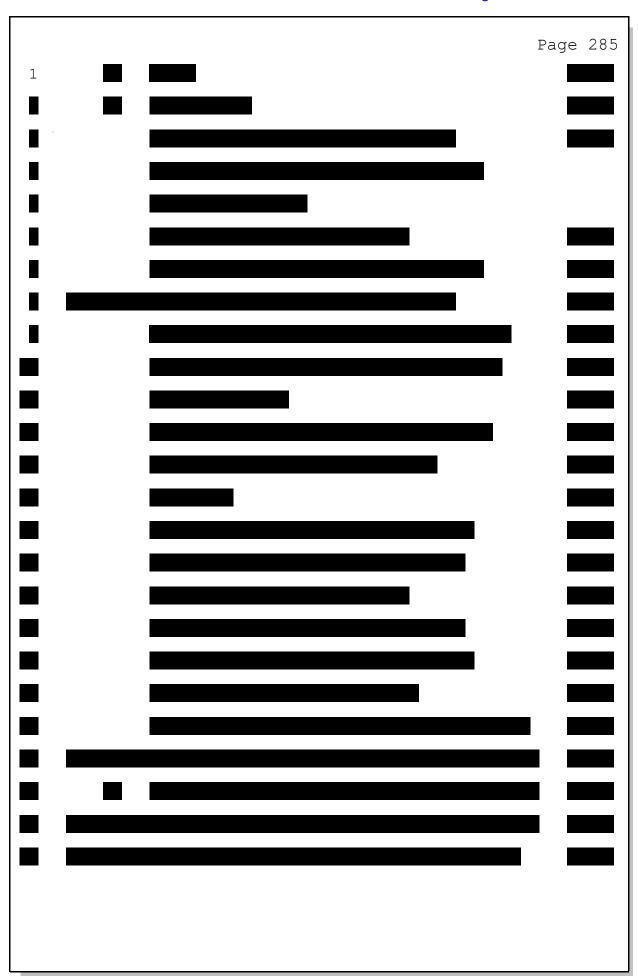
	Pac	ge 280
1		
9	MR. LOESER: We can go to the next exhibit,	18:18
10	which I believe is 27.	18:18
11	(Exhibit 27 marked for identification.)	18:19
12	MR. LOESER: We're uploading the exhibit,	18:19
13	but it's taking a minute.	18:19
14	BY MR. LOESER:	18:19
15	Q. Okay. We're showing you "Quip Business	18:19
16	Portal," dated June 13th, 2018. Are you familiar	18:19
17	with the Quip business portal and how it works?	18:19
18	A. I know Quip, the service.	18:19
19	Q. And we mentioned it previously, but tell me,	18:19
20	what is the Quip service?	18:19
21	A. It's a document-sharing service like Google	18:19
22	Docs.	18:19
23	Q. So it allows you to work with other people	18:19
24	on a document in real time?	18:20
25	A. Yes.	18:20

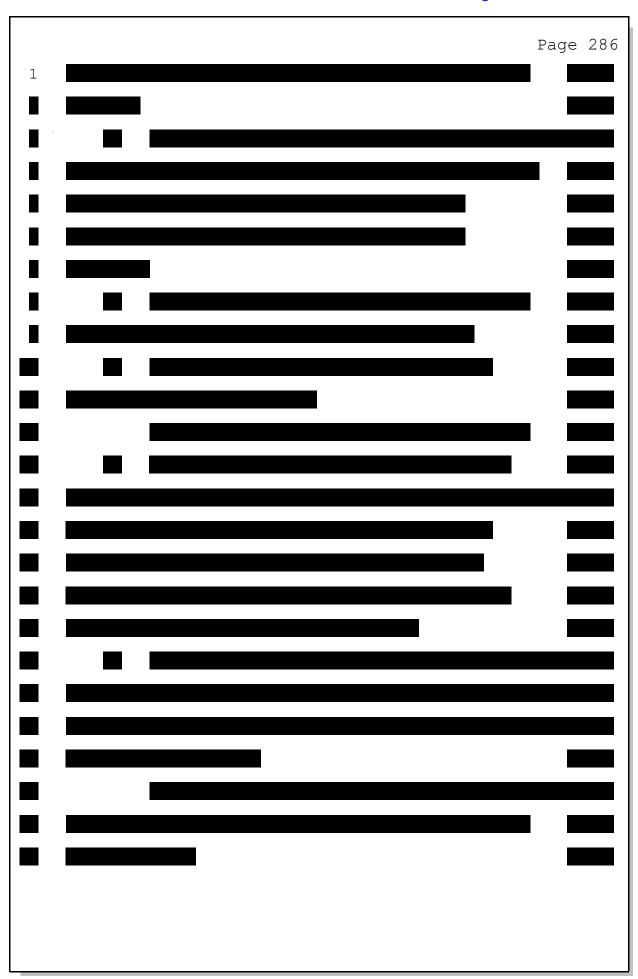
		Page 281
1	Q. And is this something	that you frequently 18:20
2	use or not?	18:20
3	A. I've used it. I used	it at whatever time 18:20
4	the service was available just	because we have a lot 18:20
5	of rotating services.	18:20
6	Q. And is the is the	service searchable? 18:20
7	A. Yes.	18:20
8	Q. How does that work?	18:20
9	A. There's a search heade	er in the service and 18:20
10	you can search for topics.	18:20
11	Q. Do you know when Facel	book started using the 18:20
12	Quip service?	18:20
13	A. I don't know exactly	when. 18:20
14	Q. And is it something the	nat's widely used at 18:20
15	Facebook?	18:20
16	A. Not now.	18:20
17	Q. When was it widely use	ed? 18:20
18	A. I don't remember the	years, but there was a 18:20
19	time where it was being used be	efore us getting 18:21
20	before Google Docs.	18:21
21	Q. And so it's something	that Facebook stopped 18:21
22	using?	18:21
23	A. Well, they're encourage	ging people to stop 18:21
24	using it, but I think there are	e still documents 18:21
25	there.	18:21

	Pag	ge 282
1	Q. Okay. And what are people now using instead	18:21
2	for the same type of functionality?	18:21
3	A. Google Docs.	18:21
4	Q. And do you use Google Docs now?	18:21
5	A. Yes.	18:21
6	Q. And when did you start using Google Docs?	18:21
7	A. I don't remember the year specifically.	18:21
8		

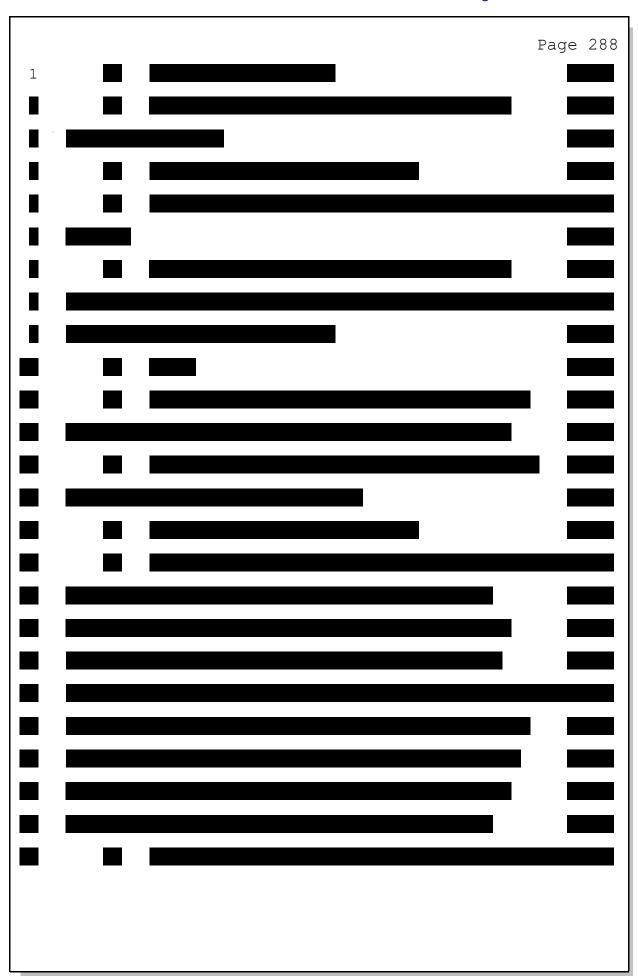
	Page 283
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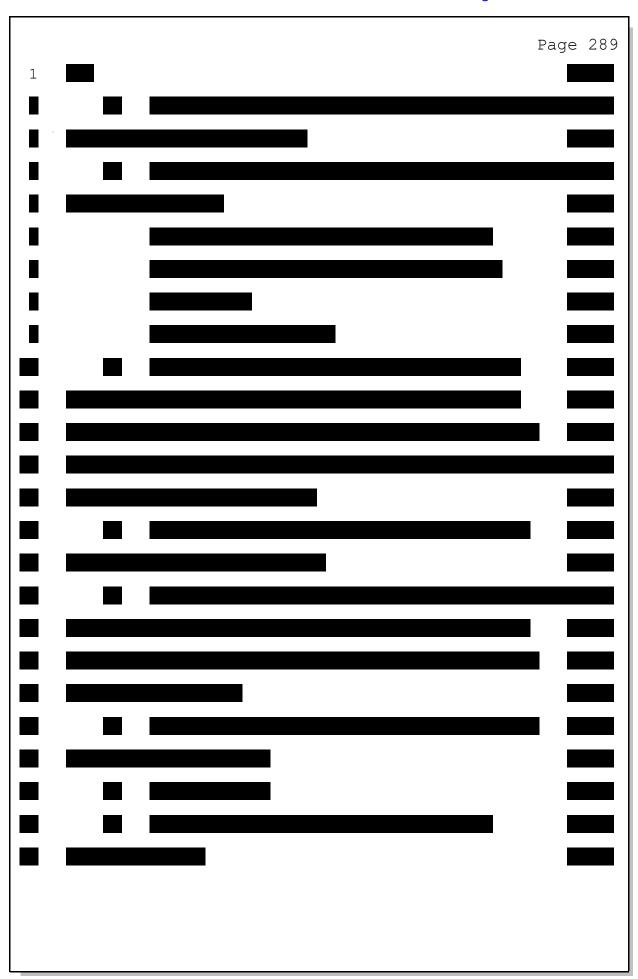
	Page	284
1		
7	Q. 2017 I can't tell from your LinkedIn, but 18	8:25
8	2007 through September 2019, it says "Head of	
9	business partner business platform partnerships."	
10	DEPOSITION REPORTER: Can you repeat that	
11	again?	
12	BY MR. LOESER:	
13	Q. It looks like in 2017, you started with	8:25
14	Internet.org and then you transitioned to head of 18	8:25
15	business platform partnerships.	
16	Do you know when in the year you 18	8:25
17	transitioned to head of business platform 18	8:25
18	partnerships?	8:25
19	A. So I don't know the specific dates, and I 18	8:25
20	didn't come in as head of business partnership. I 18	8:25
21	was a partner manager and then eventually left the 18	8:25
22	role as head.	8:26
23		

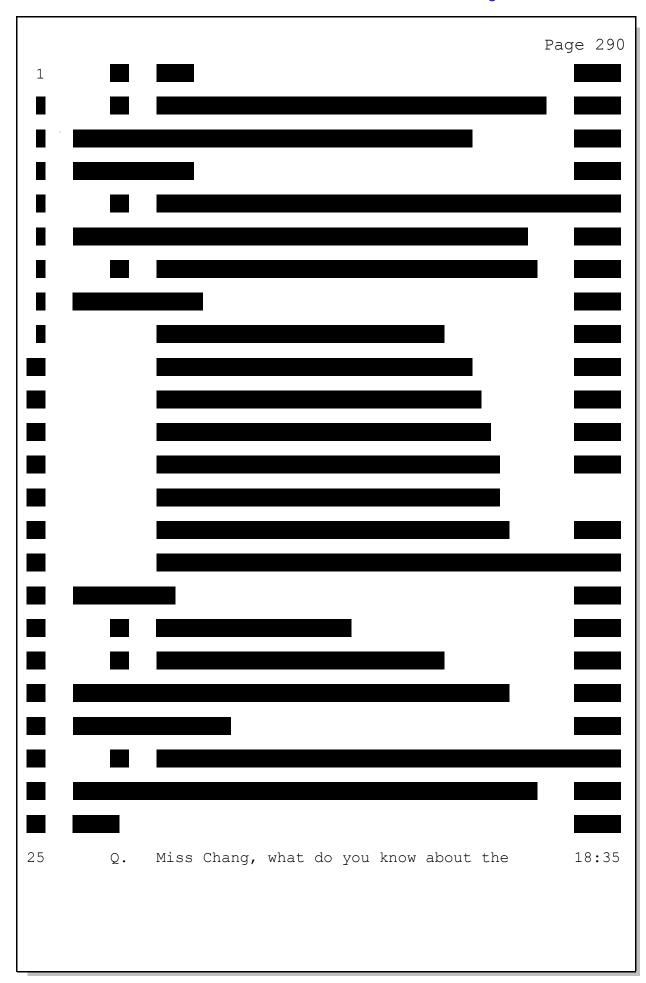




1	Page 287	
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8	Exhibit 28 is an email that will materialize	18:29
9	momentarily.	18:29
10	(Exhibit 28 marked for identification.)	18:29
11	BY MR. LOESER:	18:29
12	Q. So, Miss Chang, we are showing you an email	18:29
13	dated October 16th, 2019, that appears like it was	18:29
14	sent to yourself, sent from you to you and also to	18:29
15	Joel Yawili, that includes a chat message.	18:29
16	Who is Joel Yawili?	18:30
17	A. Joel.	18:30
18	Q. Joel.	18:30
19	A. He was someone on the team and reported to	18:30
20	me at some point in time. I don't remember the	18:30
21	exact period of time.	18:30
22		







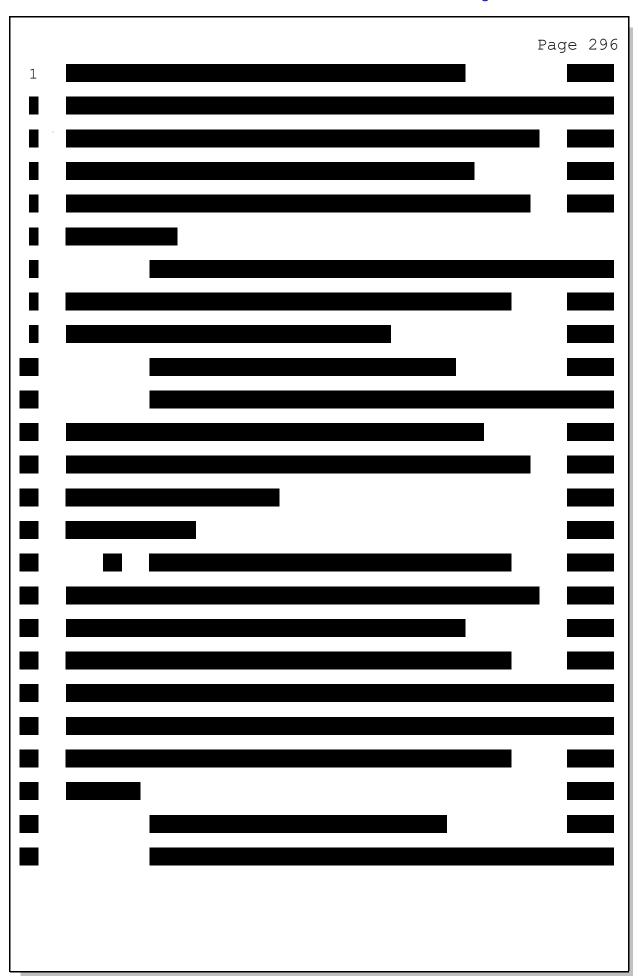
		P	age 291
1	Cambridge	e Analytica scandal on Facebook?	18:35
2	Α.	What I know is what I've read, which is	18:36
3	dealing	with like a researcher taking the	18:36
4	informat	ion and selling it to, I believe, a	18:36
5	Cambridge	e Analytica, which is a political agency.	18:36
6	Q.	And the researcher was Aleksandr Kogan; is	18:36
7	that rig	ht?	18:36
8	Α.	I believe that's his name.	18:36
9	Q.	And the problem started with an app that	18:36
10	obtained	a whole lot of friends data; is that right?	18:36
11	Α.	So I don't know the specifics of it.	18:36
12	Q.	And how many articles would you say you've	18:36
13	read abo	ut the Cambridge Analytica scandal?	18:36
14	Α.	I don't know.	18:36
15	Q.	Have there been any briefings internal to	18:36
16	Facebook	that you attended to which the Cambridge	18:37
17	Analytic	a scandal was discussed?	18:37
18	Α.	I don't recall.	18:37
19	Q.	Do you recall whether it was that was a	18:37
20	signific	ant event at Facebook?	18:37
21	Α.	Yes.	18:37
22	Q.	And did you ever cross paths with Aleksandr	18:37
23	Kogan or	Cambridge Analytica in your work with	18:37
24	partners	or researchers?	18:37
25	А.	Sorry, like him physically or	18:37

		Ра	age 292
1	Q.	No, just in your work. Or the partners or	18:37
2	was that	a researcher that you ever interacted with	18:37
3	in your	job at Facebook?	18:37
4	Α.	No.	18:37
5	Q.	Are you	
6	A.	I did not interact with him. Sorry.	18:37
7	Q.	I'm sorry. Go ahead.	18:37
8	Α.	Oh, I said, I did not interact with him.	18:37
9	Q.	Have you ever worked with political	18:37
10	advertis	sers?	18:37
11	Α.	Not to my knowledge.	18:37
12	Q.	Are you aware that Facebook worked with	18:37
13	Cambridg	ge Analytica during the 2016 Presidential	18:38
14	campaign	1?	18:38
15	Α.	So I don't know the details enough to I	18:38
16	don't kn	NOW.	18:38
17	Q.	That's not something that you were	18:38
18	particul	arly interested in learning about?	18:38
19	A.	No.	18:38
20	Q.	Now, you understand that the Cambridge	18:38
21	Analytic	ca scandal had to do with the ability of an	18:38
22	app to c	btain content information about the app	18:38
23	user's f	Friends; right?	18:38
24	Α.	So, again, I don't know the details enough	18:38
25	where I	would say I know that.	18:38

	Pac	ge 293
1	Q. So that's not something that you've gleaned	18:38
2	from the pending article you have read about the	18:38
3	Cambridge Analytica scandal?	18:39
4	A. I don't feel comfortable making that	18:39
5	assumption, so I don't know. I don't remember those	18:39
6	words exactly or anything.	18:39
7	Q. Okay. Did you read that it started with a	18:39
8	This is a Your Digital Life app that a hundred and	18:39
9	something thousand people downloaded, and from that,	18:39
10	content information was obtained for 87 million	18:39
11	Facebook users?	18:39
12	A. I don't know that specifically.	18:39
13	Q. Is that generally your understanding of what	18:39
14	happened?	18:39
15	A. Not to that specificity, but so like I said	18:39
16	earlier, the information that he sold.	18:39
17	Q. Okay. But is it your general understanding	18:39
18	that a relatively small number of people used an	18:39
19	app, and from that app, a very large number of	18:39
20	people ended up having their information obtained by	18:39
21	that app?	18:39
22	A. So, again, I I don't know specifically.	18:39
23	Q. I'm not asking you specifically. I'm just	18:40
24	asking just for the very most basic of your	18:40
25	understanding of the problem.	18:40

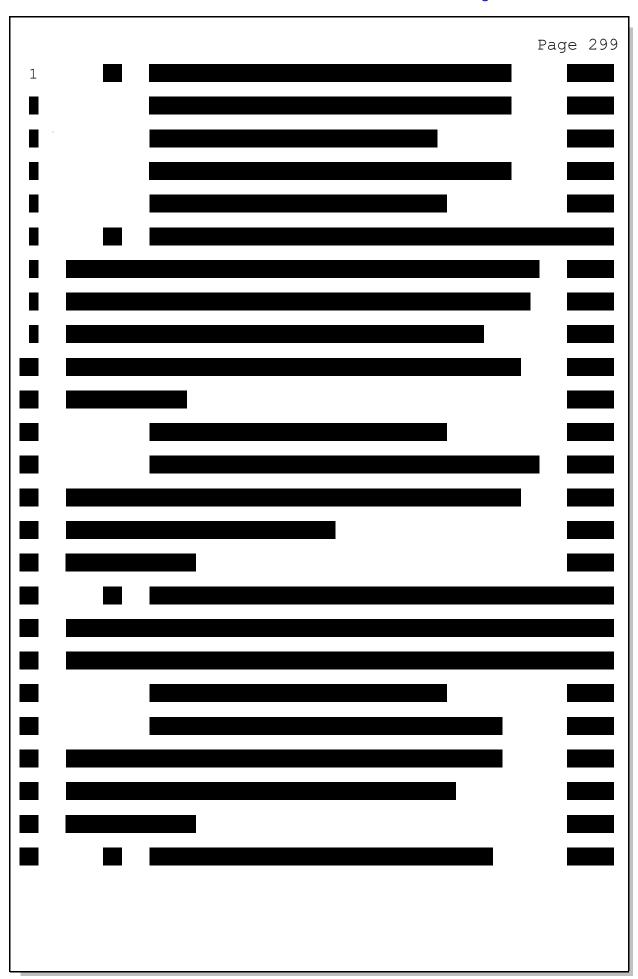
	Pa	ge 294
1	And do you have any understanding that a	18:40
2	small number or relatively small number of app users	18:40
3	caused a relatively large number of Facebook users	18:40
4	to share their information with the app?	18:40
5	A. So as you said, it's all relative, which is	18:40
6	why I don't feel comfortable making assertions on	18:40
7	how relative it is because I don't know in detail to	18:40
8	make that assumption.	18:40
9	Q. So you're saying that you can't testify to	18:40
10	any degree or in any way about whether the This is	18:40
11	Your Digital Life app was downloaded by a relatively	18:40
12	small number of people and, because of that, a whole	18:40
13	lot of people had their information shared with the	18:40
14	app who did not download the app? That's not	18:40
15	something that kind of jumped out at you from	18:40
16	reading anything about this scandal?	18:40
17	MR. FALCONER: Objection. Asked and	18:40
18	answered.	18:40
19	THE WITNESS: So those are your words and I	18:40
20	don't know if that's what was stated. I don't know	18:40
21	in specificity where I would stand behind that,	18:41
22	especially if I'm supposed to testify to what I	18:41
23	know. So I don't know that specifically.	18:41
24	BY MR. LOESER:	18:41
25	Q. And do you understand that it was friends	18:41

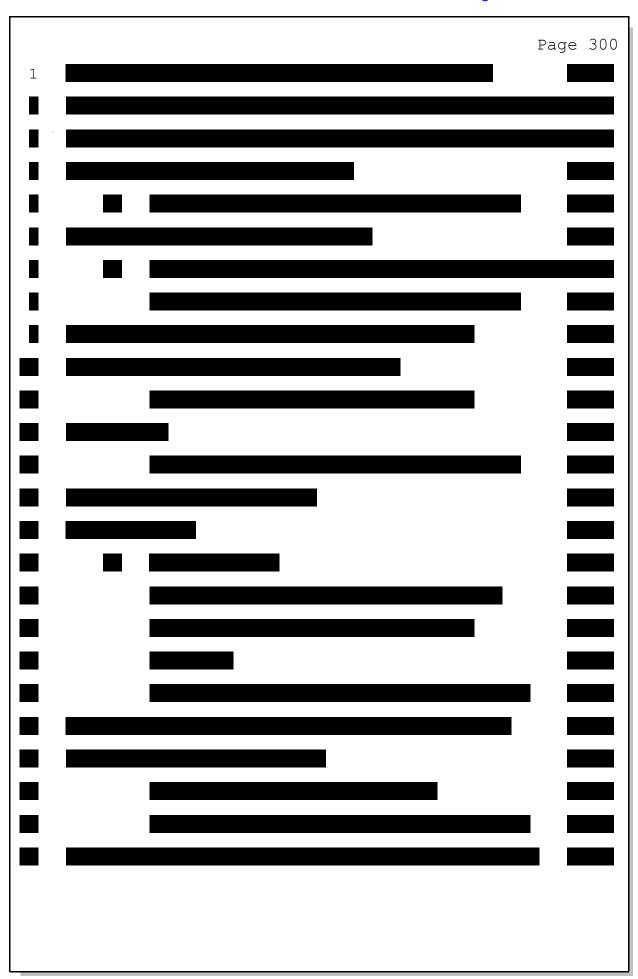
	Pa	ige 295
1	permissions that are at the heart of the ability of	18:41
2	the This is Your Digital Life app to obtain content	18:41
3	information for so many Facebook users?	18:41
4	A. So I don't know.	18:41
5	Q. Okay. And that's not something that you	18:41
6		

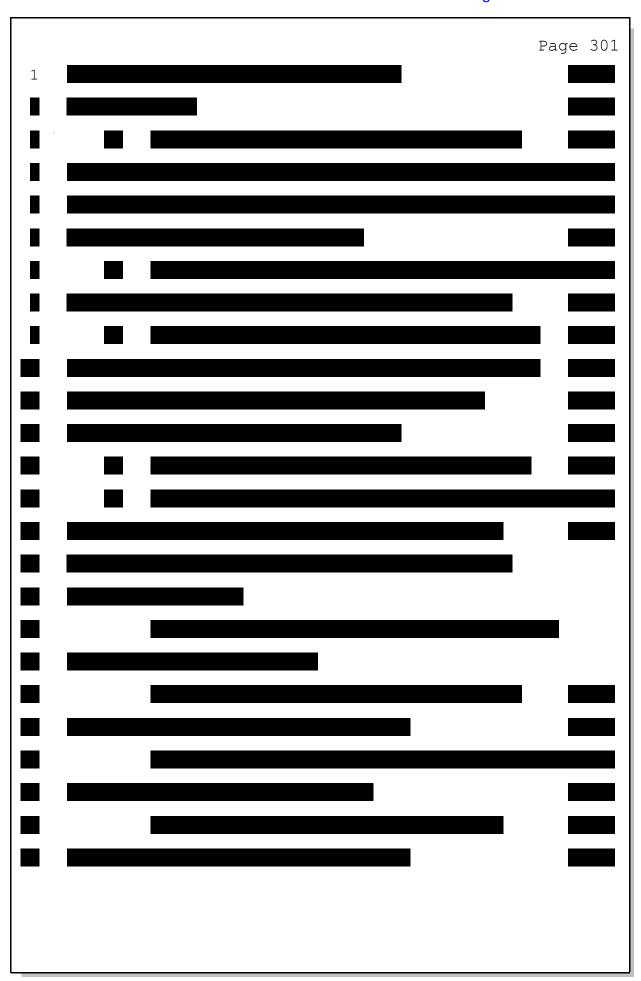


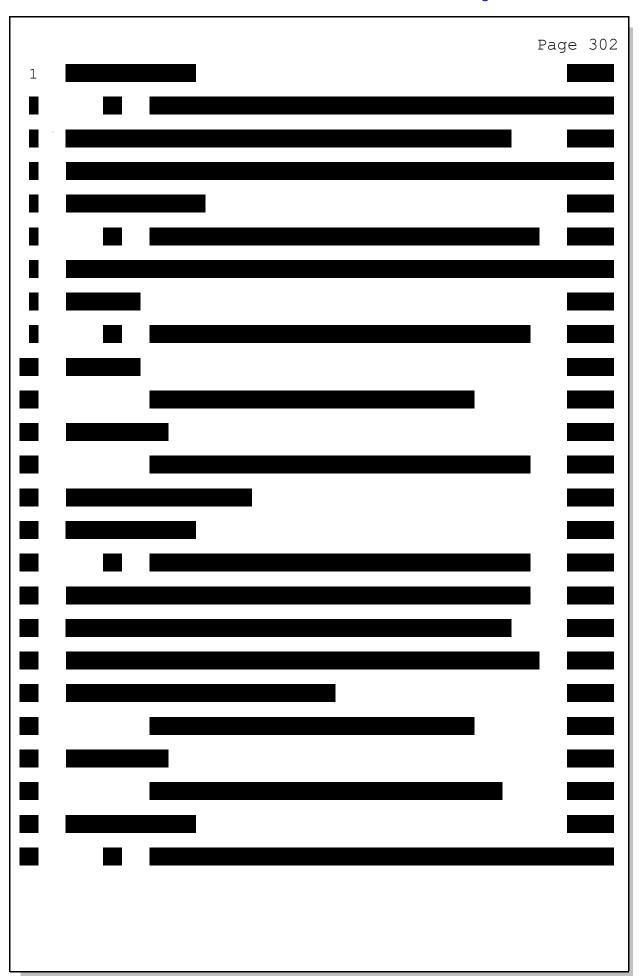
1		Pa	age 29
1 2		MR. LOESER: We can go to Exhibit 29.	18:43
3		(Exhibit 29 marked for identification.)	18:43
4	BY MR. I	LOESER:	18:4
5	Q.	Miss Chang, Exhibit 29 is an email from	18:4
)	Jackie F	Rooney, dated March 22nd, 2018, to the mteam.	18:4
,			
j			
l			
	Q.	Do you attend any of them?	18:4
	Α.	Probably a couple.	18:4
}		And why don't you spend a minute to look	
3 1	Q.	1 1	18:4

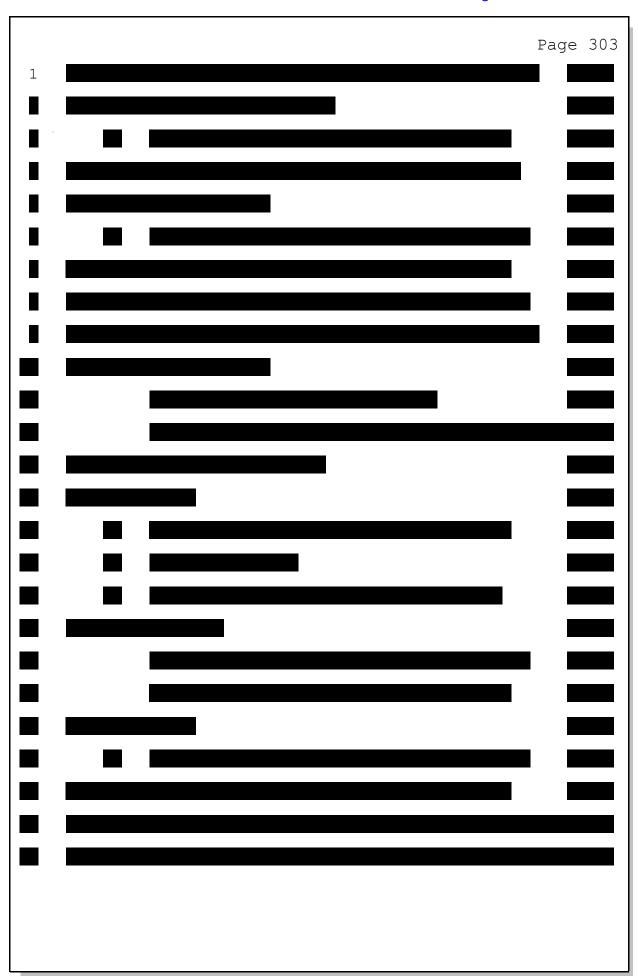
	Pa	ge 298
1	attended this one.	18:45
2	A. I don't know.	18:45
3		
8	So it appears they were going to celebrate	18:46
9	your 11 years at Facebook?	18:46
10	A. Yes.	18:46
11	Q. Do you recall anyone congratulating you in a	18:46
12	briefing on your 11 years at Facebook?	18:46
13	A. I mean, I don't know that one specifically.	18:46
14	They tend you call you out every Faceversary, so I	18:46
15	don't know if this specific one.	18:46
16		











	Pa	age 304
1		
	·	
16	MR. LOESER: Why don't we take a 10-minute	18:53
17	break. We'll go through	18:53
18	MR. FALCONER: Can we make it 5? I know	18:53
19	Miss Chang has some obligations she needs to attend	18:53
20	to this evening, so the quicker we can finish up,	18:53
21	the better.	18:53
22	MR. LOESER: Sure. That's fine.	18:53
23	THE VIDEOGRAPHER: This marks the end of	18:53
24	media No. 6 in the deposition of Jackie Chang. Off	18:53
25	the record. The time is 6:53.	18 : 53

	Pag	ge 305
1	(Off the record.)	18:53
2	THE VIDEOGRAPHER: This marks the beginning	18:59
3	of media No. 7 in the deposition of Jackie Chang.	18:59
4	Back on the record. The time is 6:59.	18:59
5	MR. LOESER: Miss Chang, I have no further	18:59
6	questions for you at this time. However, I will	18:59
7	note for the record that we are evaluating the	18:59
8	transcript and the testimony in light of Special	19:00
9	Master Garrie's comments, and we will communicate	19:00
10	with your counsel as to whether we intend to recall	19:00
11	you.	19:00
12	And with that, I know you have something	19:00
13	else to do for tonight so we can close for the	19:00
14	evening.	19:00
15	MR. FALCONER: Yeah, I mean, if there are	19:00
16	other questions, I think Miss Chang is available to	19:00
17	answer them now.	19:00
18	MR. LOESER: Well, Counsel, a couple minutes	19:00
19	ago, you told me that she needed to leave so I was	19:00
20	trying to do her the courtesy of allowing that to	19:00
21	happen.	19:00
22	If we have other questions, it would be	19:00
23	based upon our review of the testimony and the	19:00
24	discussion of certain exhibits, so it will take us a	19:00
25	bit to sort that out. And I don't want to make a	19:00
11 12 13 14 15 16 17 18 19 20 21 22 23 24	And with that, I know you have something else to do for tonight so we can close for the evening. MR. FALCONER: Yeah, I mean, if there are other questions, I think Miss Chang is available to answer them now. MR. LOESER: Well, Counsel, a couple minutes ago, you told me that she needed to leave so I was trying to do her the courtesy of allowing that to happen. If we have other questions, it would be based upon our review of the testimony and the discussion of certain exhibits, so it will take us a	19:00 19:00 19:00 19:00 19:00 19:00 19:00 19:00 19:00 19:00

	Pac	ge 306
1	rash decision, so we will just reserve our rights	19:00
2	under that and with regard to Special Master	19:00
3	Garrie's comments and get back to you.	19:00
4	MR. FALCONER: Sure. And we will reserve	19:00
5	all rights as well. I can't remember what the	19:00
6	protocol says about whether we need to say we are	19:00
7	going to read and sign, so I will state it, we will	19:01
8	read and sign, and we will reserve questions.	19:01
9	MR. LOESER: Okay. Thank you, Miss Chang, I	19:01
10	appreciate your time today. And, Russ, I appreciate	19:01
11	your involvement as well. It is a good start to a	19:01
12	lot of depositions that will be taken in terms of	19:01
13	the counsel communicating clearly and effectively	19:01
14	without wasting a lot of time on the record, so I	19:01
15	really appreciate that.	19:01
16	THE VIDEOGRAPHER: Is there anything else we	19:01
17	need on the record before I close out?	19:01
18	DEPOSITION REPORTER: Counsel, I need	19:01
19	orders. I know Gibson Dunn has a three-day expedite	
20	and a rough. What is your order?	
21	MS. WEAVER: We'd like the same.	
22	DEPOSITION REPORTER: Thank you. Who was	
23	it that said that? I'm sorry.	
24	MS. WEAVER: It's God. No, it's Lesley	
25	Weaver, and I apologize.	

		Page 307
1	DEPOSITION REPORTER: Thank you. I'm	19:01
2	ready.	19:01
3	THE VIDEOGRAPHER: Okay. We are off the	19:01
4	record at 7:01 p.m. and this concludes today's	19:01
5	testimony given by Jackie Chang. The total number	19:01
6	of media units used was seven and will be retained	19:01
7	by Veritext Legal Solutions.	19:02
8	(Off the record.)	19:02
9	DEPOSITION REPORTER: We're back on the	19:02
10	record.	19:02
11	MR. FALCONER: Facebook requests a	19:02
12	provisional confidentiality designation for the	19:02
13	transcript from today.	19:02
14	MR. LOESER: Understood.	19:02
15	(Ending time: 7:02 p.m.)	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

	Page 308
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2	
3	
4	
5	I, Jackie Chang, do hereby declare under
6	penalty of perjury that I have read the foregoing
7	transcript; that I have made corrections as appear
8	noted, in ink, initialed by me, or attached hereto; that
9	my testimony as contained herein, as corrected, is true
10	and correct.
11	EXECUTED this day of,
12	2021, at
13	(City) (State)
14	
15	
16	
17	Jackie Chang
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Page 309
                 I, JANIS JENNINGS, CSR No. 3942, Certified
1
2
       Shorthand Reporter, certify:
3
                  That the foregoing proceedings were taken
      before me at the time and place therein set forth, at
5
       which time the witness was duly sworn by me;
 6
                  That the testimony of the witness, the
 7
       questions propounded, and all objections and statements
       made at the time of the examination were recorded
8
       stenographically by me and were thereafter transcribed;
9
10
                  That the foregoing pages contain a full, true
       and accurate record of all proceedings and testimony.
11
12
                 Pursuant to F.R.C.P. 30(e)(2) before
13
       completion of the proceedings, review of the transcript
       [X] was [ ] was not requested.
14
15
                  I further certify that I am not a relative or
16
       employee of any attorney of the parties, nor financially
       interested in the action.
17
18
                 I declare under penalty of perjury under the
       laws of California that the foregoing is true and
19
20
       correct.
       Dated: 12/21/2021
21
22
23
                          <%6044,Signature%>
24
                       JANIS JENNINGS, CSR NO. 3942
25
                       CLR, CCRR
```

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     RUSSELL H. FALCONER, ESO.
    rfalconer@gibsondunn.com
 2
 3
                                           December 21, 2021
    RE: IN RE: FACEBOOK, INC. CONSUMER
 4
 5
         PRIVACY USER PROFILE LITIGATION
 6
     12/16/2021, JACKIE CHANG, JOB NO. 49769494
     The above-referenced transcript has been
     completed by Veritext Legal Solutions and
     review of the transcript is being handled as follows:
 8
     Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
        to schedule a time to review the original transcript at
10
        a Veritext office.
11
12
      Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
13
        Transcript - The witness should review the transcript and
14
        make any necessary corrections on the errata pages included
15
        below, notating the page and line number of the corrections.
16
        The witness should then sign and date the errata and penalty
        of perjury pages and return the completed pages to all
17
        appearing counsel within the period of time determined at
18
19
        the deposition or provided by the Code of Civil Procedure.
      Waiving the CA Code of Civil Procedure per Stipulation of
20
        Counsel - Original transcript to be released for signature
21
2.2
        as determined at the deposition.
     Signature Waived - Reading & Signature was waived at the
23
24
        time of the deposition.
25
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     X Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF
 2
        Transcript - The witness should review the transcript and
        make any necessary corrections on the errata pages included
 3
        below, notating the page and line number of the corrections.
 4
 5
        The witness should then sign and date the errata and penalty
        of perjury pages and return the completed pages to all
 6
        appearing counsel within the period of time determined at
        the deposition or provided by the Federal Rules.
 8
      Federal R&S Not Requested - Reading & Signature was not
        requested before the completion of the deposition.
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